

## **Exhibit 2**

# **PLAINTIFFS' RESPONSE TO DEFENDANTS' MOTION TO EXCLUDE GENERAL CAUSATION TESTIMONY OF PLAINTIFFS' EXPERTS**

Case No.: 4:22-md-03047-YGR

MDL No. 3047

In Re: Social Media Adolescent Addiction/Personal Injury Products Liability Litigation

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SUPERIOR COURT OF THE STATE OF CALIFORNIA  
FOR THE COUNTY OF LOS ANGELES

COORDINATION PROCEEDING ) JCCP No. 5255  
SPECIAL TITLE [Rule 3.400] ) For Filing Purposes:  
 ) 22STCV21355  
 )  
IN RE: SOCIAL MEDIA ADOLESCENT )  
ADDICTION (JCCP No. 5255) )

THIS DOCUMENT RELATES TO:  
Cristina Arlington Smith, et al.  
V. Meta Platforms, Inc., et al.,  
Case No. 22STCV21355

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VIDEOTAPED DEPOSITION OF EVA H. TELZER, Ph.D.

JB Duke Hotel

230 Science Drive

Durham, North Carolina

Thursday, June 12, 2025, 9:12 a.m.

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1 P R O C E E D I N G S

2 \* \* \*

3 THE VIDEOGRAPHER: We are now on the

4 record. Today's date is June 12th, 2024 --

5 THE WITNESS: No.

6 THE VIDEOGRAPHER: -- 25, and the time

7 is 9:12 a.m. This is the video deposition in

8 regards to Social Media Adolescent Addiction

9 Personal Injury Product Liability Litigation,

10 Case Number 4:22-MD-03047-YGR. Counsel will be

11 noted on the stenographic record.

12 Can our court reporter please swear in

13 our witness.

14 \* \* \*

15 EVA H. TELZER, Ph.D.,

16 having been first duly sworn, was examined and

17 testified as follows:

18 \* \* \*

19 EXAMINATION

20 BY MS. JONES:

21 Q. Hi, Dr. Telzer.

22 A. Hi.

23 Q. How are you? I'm Phyllis Jones. We

24 met in the hallway earlier. I'm one of the lawyers

25 for Meta Platforms, which is one of the defendants

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1 in this case. It's nice to see you. Thank you for

2 your time. Have you been deposed before?

3 A. No.

4 Q. First time today?

5 A. Yes.

6 Q. Okay. Well, welcome. You brought with

7 you, it appears, a couple of gigantic binders.

8 What do you have with you?

9 A. I have my report on 4/18 and the 5/16

10 version of that.

11 Q. Okay. So your -- the binder that you

12 first referred to is your report --

13 A. The JCCP report.

14 Q. Okay. Let me -- let me give you a

15 little bit of feedback early on just on deposition

16 because we'll be in trouble with the court reporter

17 if I -- we talk over each other.

18 Give me a chance to finish my question,

19 and I'll give you a chance to finish your answer.

20 Does that work?

21 A. Yes.

22 Q. Okay. So the first binder that you

23 referred to, you said, was a copy of your report

24 from the JCCP proceeding, correct?

25 A. Correct.

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Q. And do you understand what the JCCP proceeding is relative to the other proceeding?

A. Broadly speaking.

Q. Okay. And then the second binder that you have is a copy of your expert report from the so-called MDL proceeding; is that right?

A. Correct.

Q. Okay. And does that include -- what does that include beyond just the text of your report itself?

A. What does this include?

Q. Yes.

A. This includes the text of my report, the materials I considered, my CV, the underlying data to -- unpublished data.

Q. Okay. What about in the binder for the MDL?

A. Similar.

Q. Okay. And we don't have to do it right now, but on a break we might just flip through that quickly just so we have an understanding of what specifically is in there in terms of the hard copies. Is that okay?

A. Yes.

Q. Okay. Let me -- I actually want to

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just start by seeing if we can get a little bit of a sense of your views on some of the issues that we're going to be talking about today and tomorrow. And we're going to start with an exhibit that is actually a video clip. We've marked this as Exhibit Number 1.

MS. JONES: And this is 78-B, Ryan.

(TELZER EXHIBIT 1, Video Re: Healthy Heels Digital Minds: Brain Development in the Age of Technology, was marked for identification.)

BY MS. JONES:

Q. And I think it's going to play on the screen in front of you and perhaps one of these other screens in the room, okay?

(Playing video.)

BY MS. JONES:

Q. That is a video of you; is that right?

A. That is me.

Q. And that's a talk that you did in February of 2025; is that right?

A. I don't know. You have not given me any context of where that is from.

Q. Okay. Do you recall giving a talk in 2025 called "Brain Development in the Age of Technology"?

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A. I give lots and lots of talks. So I'd have to refer to my CV for a specific one.

Q. Okay. That's fine.

Let's assume for a moment that this was a talk that you gave in February of 2025. That would have been four months ago, right?

MS. COUCH: Objection. Lack of foundation.

BY MS. JONES:

Q. Well, was February of 2025 four months ago?

A. February of '25 was four months ago.

Q. Okay.

A. I do not know the date of that particular talk.

Q. Okay. We can get that for you.

You -- and the statements that were made in Exhibit Number 1, the video clip that we just played for you, those were true statements at the time that you made them; is that right?

A. I made those statements --

Q. Okay.

A. -- at that time.

Q. And one of the things that you said specifically was, "We do need to be a little bit

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cautious in making these causal claims," correct?

A. Out of context of being able to see the full talk and who I was giving that to, those statements that I made are correct as seen.

Q. Okay. And is that statement still true today, that we need to be a little bit cautious in making these causal claims?

A. In any single case, I might say that we need to be cautious. When looking at the totality of everything that I have reviewed, that is not my full opinion.

Q. And I just want to make sure I'm clear. My question was, simply: Is it true that what you said in that video clip that we just showed you, "We do need to be a little bit cautious in making these causal claims," is that true today?

MS. COUCH: Objection. Vague.

THE WITNESS: I would say that that statement that I said -- in the context, I would need to see further. But in the context of all of the research that I have done, based on my education, based on talking to parents, my conclusion is that we can make causal claims.

BY MS. JONES:

Q. Okay. And the specific causal claims

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1 that we're talking about today is the causal claim  
2 that social media causes certain mental health  
3 harms; is that right?

4 A. I have the opinion, based on my  
5 education, based on the research that I reviewed,  
6 based on seeing internal documents, based on  
7 talking to parents and children across many, many  
8 contexts, that social media causes harms to mental  
9 health and that this is affecting their brain  
10 development.

11 Q. Okay. And when you said, "We do" --  
12 and let -- let me read the whole sentence just to  
13 be fair to you.

14 "And -- and so we're just starting to  
15 get there with our science, but we do need to be a  
16 little bit cautious in making these causal claims."

17 The specific causal claims that you  
18 were referring to there, does that include the  
19 claim that social media can cause mental health  
20 harms to teens?

21 MS. COUCH: Objection. Lack of  
22 foundation.

23 THE WITNESS: Can you repeat the  
24 question, please?

25 BY MS. JONES:

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1 Q. Sure.

2 Looking back at the sentence that you  
3 expressed in that video clip, which was, "And so  
4 we're just starting to get there with our science,  
5 but we do need to be a little bit cautious in  
6 making these causal claims," the specific causal  
7 claims that you were referring to there, does that  
8 include the claim that social media can cause  
9 mental health harms to teens?

10 MS. COUCH: Same objection.

11 THE WITNESS: Indicating that we need  
12 to be cautious does not in any way say that I do  
13 not have the opinion that there are causal links  
14 between social media and mental health in  
15 adolescents.

16 BY MS. JONES:

17 Q. Sure.

18 My question -- my question was: You  
19 refer specifically to causal claims, yes?

20 A. As I said, we always need to be  
21 cautious, but that does not change my opinion that  
22 social media causes these harms.

23 Q. Dr. Telzer, one of the other rules of  
24 the road for the deposition is that I get to ask  
25 you questions, and I'm entitled to have responsive

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1 answers to my questions. Your counsel, if they  
2 want to ask you questions later, get a chance to do  
3 that.

4 My question, very specifically, was:  
5 When you were referring to causal claims in that  
6 video clip, were you referring to, among other  
7 things, the claim that social media can cause  
8 mental health harms in teenagers?

9 A. I was indicating that we need to be  
10 cautious as always when we say that there may be  
11 causal claims. And then without seeing the context  
12 of this, that does not change my opinion that  
13 social media causes these harms.

14 Q. Do you believe that we need to be  
15 cautious with respect to making causal claims about  
16 social media causing mental health harms in  
17 teenagers?

18 A. Can you repeat that, please?

19 Q. Yes.

20 Do you believe that we need to be  
21 cautious with respect to making causal claims about  
22 social media causing mental health harms in  
23 teenagers?

24 A. I don't believe that we need to be  
25 cautious about making that claim based today on my

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1 review of all the literature in my report. I can  
2 say very confidently that social media causes these  
3 harms.

4 Q. When you made that statement in  
5 whatever time frame it was that we need to be a  
6 little bit cautious in making causal claims, did  
7 you believe then that we needed to be cautious  
8 about making the claim that social media can cause  
9 mental health harms?

10 MS. COUCH: Object to form.

11 THE WITNESS: I don't know in the  
12 context of this what my thought was at the time.  
13 Today my opinion is, based on all the literature  
14 that I have done, that social media causes these  
15 harms.

16 BY MS. JONES:

17 Q. Do you think it's possible that your  
18 views have changed from when you made that  
19 statement to today?

20 MS. COUCH: Object to the form. Calls  
21 for speculation.

22 THE WITNESS: I can't speculate on  
23 that.

24 BY MS. JONES:

25 Q. You can't speculate on whether your

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1 views have changed?

2 A. My views have not changed.

3 Q. Okay. So do you think what you said  
4 previously still applies today?

5 A. What I said previously is taken out of  
6 context, and what I believe today is based on a  
7 host of research that I have done. My opinions  
8 have been formed by everything that is reported  
9 here in my report.

10 Q. Let's go back to the more general  
11 proposition about this notion of being cautious  
12 about causal claims.

13 Do you agree with the general  
14 proposition that scientists and academic  
15 researchers should not make causation claims when  
16 they are not sufficiently supported by the science?

17 MS. COUCH: Objection. Vague.

18 THE WITNESS: If I understand your  
19 question correctly, you're asking if scientists  
20 should never make causal claims?

21 BY MS. JONES:

22 Q. I didn't say "never" or --

23 A. Sorry.

24 Q. -- the rest of that.

25 A. Please repeat that.

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1 Q. What I said was: Do you agree with the  
2 general proposition that scientists and academic  
3 researchers should not make causation claims when  
4 they are not sufficiently supported by the science?

5 MS. COUCH: Objection. Vague.

6 THE WITNESS: I believe that our -- I  
7 believe that we can make causal claims when we  
8 review the full totality of the research and rely  
9 on our strong education and background.

10 BY MS. JONES:

11 Q. And what you told me earlier is that,  
12 sitting here today, you believe that social media  
13 can cause mental health harm in teenagers; is that  
14 right?

15 A. I'm not sure if that's exactly what I  
16 said. I believe that social media causes harms,  
17 and that is based on the totality of the research  
18 that I have done.

19 Q. Well, let me get you to answer my  
20 question.

21 Do you believe, sitting here today,  
22 that the science supports the conclusion that  
23 social media causes mental health harms in  
24 teenagers, yes or no?

25 A. Yes.

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1 MS. COUCH: Object to the form.

2 THE WITNESS: I believe that social  
3 media can cause major harms to adolescents in  
4 specific ways that are altering adolescents'  
5 brains.

6 BY MS. JONES:

7 Q. And what you just said, that social  
8 media can cause major harms to adolescents in  
9 specific ways that are altering adolescents'  
10 brains, you have never published that statement in  
11 any of your peer-reviewed publications, correct?

12 A. I may have. I would have to look  
13 through all my publications. But I have made those  
14 statements that social media is changing  
15 adolescents' brains, absolutely.

16 Q. Are -- are you testifying today that  
17 you believe that in some of the -- in any of the  
18 peer-reviewed articles that you've published that  
19 somewhere you have said social media can cause  
20 major harms to adolescents in specific ways that  
21 are altering adolescents' brains? Can cause?

22 A. I'm not saying I may have used those  
23 specific words.

24 Q. Have you ever used the word "causation"  
25 to describe the relationship between the use of

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1 social media and potential changes in adolescent  
2 brains and resulting mental health harms?

3 A. I'll answer that in a couple ways.

4 Firstly, with all due respect, we use  
5 different lexicon in our published research, where  
6 we are more cautious in a singular study where we  
7 talk about links between things and use the word  
8 "causal" differently than I would in a report when  
9 going through the totality of the research.

10 When I say "may lead to" or "may  
11 contribute to" or "may cause," those are all  
12 broadly under the same umbrella, indicating that  
13 social media is changing the adolescent brain.

14 Q. Are you able to answer my question  
15 "yes" or "no"? Have you ever used the word "cause"  
16 to describe the relationship between social media  
17 use and potential harms to teen mental health?

18 MS. COUCH: Object to form.

19 BY MS. JONES:

20 Q. Have you -- have you ever used that in  
21 anything that you have published in the  
22 peer-reviewed literature?

23 A. I would need to go through all of my  
24 publications --

25 Q. Do you think, sitting here today, that

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1 you might have and you just don't remember?

2 MS. COUCH: Calls for speculation.

3 THE WITNESS: I would have to go  
4 through all my publications to see.

5 BY MS. JONES:

6 Q. So you don't know one way or the other?

7 A. I can't tell you without going through  
8 all of my publications to look.

9 Q. Okay. Have you ever, outside of your  
10 work in this litigation as an expert, published in  
11 any of your peer-reviewed work that social media  
12 use causes depression in teenagers?

13 A. Have I ever published work that social  
14 media causes depression in teenagers?

15 Q. Yes.

16 A. We have published lots of studies  
17 looking at the links between social media and  
18 adolescent depression in teenagers, yes.

19 Q. Yeah. My question was not that.

20 My question was: Have you ever,  
21 outside your work in this litigation as an expert,  
22 published in any of your peer-reviewed work that  
23 social media use causes depression in teenagers?

24 A. Based on the individual studies that we  
25 have done and putting the totality of those

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1 together based on the rigorous methods that we use  
2 with within-person analyses that control for all  
3 kinds of confounding variables, we have published  
4 data that shows that adolescent social media use  
5 causes depression.

6 Q. What specific study are you referring  
7 to?

8 A. We have a handful of studies that look  
9 at this.

10 Q. What are they?

11 A. I can -- if you want to go through my  
12 CV, I can pull those up.

13 Q. There are none that come to mind at the  
14 moment where you have said social media use can  
15 cause depression in teenagers?

16 A. If you look at the data in our papers,  
17 we have very causal evidence that social media  
18 causes depression in the moment that it's  
19 happening.

20 Using these within-person analyses with  
21 repeated measures over adolescence, we can say very  
22 confidently that social media causes depression in  
23 adolescents in the moments that it's happening.

24 Q. Have you said -- did you say that in  
25 the paper that you're thinking of?

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1 A. When you look at the data, it shows  
2 these effects very strongly.

3 Q. Yeah. My -- I need you to just focus  
4 as much as you can, or we're going to be here both  
5 today and tomorrow and maybe later --

6 A. Happy to.

7 Q. -- on my question.

8 In the paper that you're referring to,  
9 did you and your co-authors specifically say:  
10 Social media causes or can cause depression in  
11 teenagers? Did you use those words?

12 A. I would have to look at -- excuse me.

13 I would have to look at a specific  
14 publication in order to verify that those words  
15 were used.

16 Q. Let me ask you a different question or  
17 about a different outcome.

18 Have you ever in your peer-reviewed  
19 literature outside of this litigation offered the  
20 opinion that the use of social media causes or can  
21 cause anxiety?

22 A. We have looked at depression more  
23 frequently. So I can -- I would need to look  
24 through my publications to look more at the  
25 totality of our work on anxiety.

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1 I believe we have links between social  
2 media use and anxiety, but I would need to look at  
3 the specific publications in order to respond to  
4 that.

5 Q. So you don't know?

6 A. I would need to look at the  
7 publications in detail to be able to respond to  
8 that.

9 Q. Okay. What about eating disorders?  
10 Have you ever in the context of your publications  
11 in the peer-reviewed literature said that social  
12 media can cause or contribute to cause eating  
13 disorders in teenagers?

14 A. My research has focused on things like  
15 body image, which contributes to eating disorders.  
16 But I do not study eating disorders themselves.

17 Q. So is that a -- a "no" to my question?

18 MS. COUCH: Object to form.

19 BY MS. JONES:

20 Q. Have you -- have you ever, in any of  
21 your peer-reviewed publications, offered the view  
22 that the use of social media can cause eating  
23 disorders in teenagers?

24 A. I would have to, again, look through my  
25 specific publications to be able to answer that

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1 with confidence. But I can tell you that we look  
2 at body image and we make statements about how body  
3 image contributes to eating disorders, but I am not  
4 an eating disorders expert who studied that in my  
5 work.

6 Q. Have you ever in your peer-reviewed  
7 literature said that social media use can lead to  
8 body image issues?

9 A. We currently have a grant where we make  
10 very strong statements in the grant about  
11 adolescents.

12 Q. Hold on a second.

13 MS. JONES: Can you go around to the  
14 other end of the table?

15 THE WITNESS: Can you repeat your  
16 question after --

17 BY MS. JONES:

18 Q. Yeah. Have you in your peer-reviewed  
19 publications ever offered the view that social  
20 media can cause body image issues in teenagers?

21 A. This is an emerging area that we're  
22 working on.

23 So we have ongoing research on this  
24 with a federally funded grant where we make in the  
25 grant statements about how social media causes

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1 changes in adolescents' negative body image that  
2 contributes to eating disorders.

3 I would have to go through my  
4 peer-reviewed publications to see if that has been  
5 said in the publication.

6 Q. But nothing comes to mind at the  
7 moment?

8 A. I would have to look.

9 Q. Okay. What about for teenagers who are  
10 suffering with or experiencing suicidal thoughts?  
11 Have you ever in your peer-reviewed published work  
12 offered the opinion that social media use can cause  
13 those teens to become more suicidal?

14 A. I collaborate with colleagues who study  
15 nonsuicide self-injury as well as suicide. In my  
16 own work, that is not a topic that I studied.

17 Q. And, in fact, in your own work, you  
18 have published data that suggest that social media  
19 use might be helpful to teenagers who are suicidal,  
20 correct?

21 A. I have a publication with my colleague  
22 who is an expert in nonsuicide self-injury that  
23 shows that when adolescents who have suicidal  
24 thoughts have online-only friends, it can buffer  
25 them. But that does not indicate that there are

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1 not also harms of social media.

2 Q. In -- in your written report in this  
3 case, did you talk about the research that you have  
4 done that establishes that social media can  
5 actually have benefits on certain teenagers?

6 MS. COUCH: Object to the form.

7 BY MS. JONES:

8 Q. Did you understand my question?

9 A. Yeah. I'm trying to think through the  
10 hundreds of pages that I have here.

11 Q. Well, let me -- let me pause you for a  
12 second. Your report -- why don't we go ahead and  
13 mark that.

14 (TELZER EXHIBIT 2, Expert Report of Eva  
15 Telzer, Ph.D., April 18, 2025, was marked for  
16 identification.)

17 BY MS. JONES:

18 Q. And I'm just handing you a copy of your  
19 JCCP report because I think you're going to get to  
20 ask -- or answer questions about your MDL report at  
21 another time.

22 This is Exhibit Number 2. You can also  
23 look at your version, but that's your JCCP report.

24 The first part of that Exhibit Number 2  
25 is the actual written portion of your report,

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1 right?

2 A. Correct.

3 Q. And it's about 189, 190 pages, right?

4 A. Sure.

5 Q. Do you recall, in any of those 189, 190  
6 pages, whether you ever talked about the literature  
7 that exists, including your own work, that says  
8 that social media can actually be helpful for  
9 certain teenagers? Did you mention that at all in  
10 your report?

11 A. While I did not necessarily discuss the  
12 benefits of social media, that does not negate the  
13 fact that there are many, many harms of social  
14 media. And that was the focus of my report, to try  
15 to understand and do a thorough literature -- a  
16 thorough literature search and review of the harms  
17 of social media.

18 Q. And so let me just follow up on that.  
19 You understood your role in this litigation to be  
20 just to focus on what the literature says about the  
21 harms of social media? Is that what you're saying?

22 MS. COUCH: Misstates the report.

23 THE WITNESS: I think if you go to the  
24 first page of my report on "Assignment," you can  
25 see exactly what my report sought to do.

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1 BY MS. JONES:

2 Q. I need you to answer my question.

3 My question was: Was your  
4 understanding that your role -- I'm just following  
5 up on your testimony -- that your role in this  
6 litigation was to focus on a review of the  
7 literature with respect to the harms of social  
8 media?

9 MS. COUCH: Asked and answered.

10 THE WITNESS: I can read to you what I  
11 believe my assignment was. I've been asked to  
12 provide an overview of the adolescent brain, the  
13 vulnerabilities that exist that increase the risk  
14 of harm for social media and the relationship  
15 between social media use and function and  
16 structural changes to the adolescent brain.

17 BY MS. JONES:

18 Q. Did you understand your role as an  
19 expert in this case to be to provide a  
20 comprehensive overview of the literature, whether  
21 it was about harms or benefits, or were you just  
22 focused on harms?

23 MS. COUCH: Object to the form.  
24 Misstates the report.

25 THE WITNESS: As I indicated, my

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1 assignment was to provide an overview of the  
2 adolescent brain, the vulnerabilities that exist  
3 that increase the risk of harm for adolescent --  
4 for social media and the relationship between  
5 social media use and function and structural  
6 changes to the adolescent brain.

7 BY MS. JONES:

8 Q. Do you intend to testify at a trial in  
9 this case?

10 A. If I am asked to and needed, I will.

11 Q. Do you think part of your role as a  
12 testifying expert before a jury is to give a full  
13 sense of what the scientific literature says about  
14 the role of social media in adolescent and teen  
15 development?

16 MS. COUCH: Objection. Calls for legal  
17 reasoning. And Dr. Telzer is not a lawyer.

18 BY MS. JONES:

19 Q. I'm not asking you as a lawyer. I'm  
20 asking you as a person who has signed up to be an  
21 expert in these cases and who has said that you  
22 would be willing to come and testify before a jury.

23 Do you believe that you have a  
24 responsibility to provide a full sense to that jury  
25 of what the literature says, whether it's about

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1 harms or whether it's about benefits?

2 A. I can't answer that.

3 MS. COUCH: Object to the form.

4 BY MS. JONES:

5 Q. You can't answer that question?

6 A. I don't know the answer to that  
7 question.

8 Q. You don't know if the jury would be  
9 entitled to have an assessment of the complete  
10 picture of the science?

11 MS. COUCH: Asked and answered.  
12 Argumentative. I would also point out, for the  
13 record, the defense JCCP report is one-sided.

14 BY MS. JONES:

15 Q. You can answer my question.

16 A. I cannot speculate about the trial  
17 aspects of this. I don't know.

18 Q. Okay. You do not -- in your roughly  
19 190-page written report, Exhibit Number 2 for the  
20 JCCP, you don't have any portion of that report  
21 that's focused on talking about the fact that there  
22 may be benefits of social media for certain  
23 teenagers, right?

24 MS. COUCH: Misstates --

25 BY MS. JONES:

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1 Q. There's not a section in your report on  
2 that, correct?

3 MS. COUCH: Misstates the report.

4 THE WITNESS: As I indicated what my  
5 specific assignment was, I provide and was asked to  
6 provide an overview of the adolescent brain, the  
7 vulnerabilities that exist that increase the risk  
8 of harm for social media, and the relationship  
9 between social media use and function and  
10 structural changes to the adolescent brain.

11 BY MS. JONES:

12 Q. Yeah, I've -- I've heard you read that  
13 now three times. My question was: Is there a  
14 section in that report where you acknowledge that  
15 there are, in fact, benefits of social media use  
16 for certain adolescents or teenagers? Do you -- do  
17 you know?

18 MS. COUCH: Asked and answered.

19 THE WITNESS: As I've indicated to the  
20 same question, I've been asked to provide an  
21 overview of the adolescent brain, the  
22 vulnerabilities that exist that increase the risk  
23 of harm for social media, and the relationship  
24 between social media use and function and  
25 structural changes to the adolescent brain.

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1 BY MS. JONES:

2 Q. Outside of the context of this  
3 litigation, you have acknowledged that social media  
4 can have benefits for certain teenagers, yes?

5 A. The fact that social media may have  
6 some benefits does not negate the fact that there  
7 are much more compelling results and significant  
8 data that show the harms that completely outweigh  
9 any of the benefits of social media.

10 Q. And that last statement that you just  
11 made, that the harms of social media completely  
12 outweigh the benefits of social media, have you  
13 ever articulated that opinion in any of your  
14 published work anywhere?

15 A. Based on all of the research that I  
16 have done in totality, I can make those claims by  
17 reviewing all of the literature.

18 And based on my discussions with  
19 adolescents, my discussions with parents, my  
20 discussions going into schools and reviewing the  
21 underlying for the documents of the defense  
22 documents, I can say that very confidently.

23 Q. My -- that wasn't my question. I  
24 recognize you're confident about your view today.

25 My question is: Have you ever, in your

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1 published literature, articulated this view that  
2 you've now shared with us that the harms of social  
3 media for teenagers are -- vastly outweigh any  
4 potential benefits for teenagers?

5 A. I would have to go back --

6 MS. COUCH: Asked and answered.

7 THE WITNESS: -- and look through my  
8 publications.

9 BY MS. JONES:

10 Q. Okay.

11 A. But in any single empirical article,  
12 that is not the purpose of the analyses. And I  
13 look at the totality of the research to make that  
14 claim.

15 BY MS. JONES:

16 Q. Before you got ready for your -- you  
17 knew when you came for your deposition that you  
18 were probably going to be asked about what you have  
19 written in your literature, yes?

20 A. Written in what literature?

21 Q. The things that you've published in the  
22 peer-reviewed literature.

23 A. Can you say that question again,  
24 please?

25 Q. Did you understand that one of the

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1 things you might be asked about was the views  
2 you've expressed outside of litigation in the  
3 peer-reviewed litigation on the subject of social  
4 media use and teen mental health?

5 A. I understand I might be asked about my  
6 published literature, if that's the question.

7 Q. Yeah.

8 And my question is: Did you actually  
9 go back and look at it before you came here for  
10 your deposition today?

11 A. Did I go back and look at my  
12 publications?

13 Q. On the subjects of social media use and  
14 teen mental health?

15 A. I have published extensively on this  
16 topic. I have not gone back and reread every  
17 single publication for the purposes of today's  
18 discussion.

19 Q. Okay. One of the other things that  
20 you -- one of the things that you said on the  
21 slide -- and if you need to see it again, we can  
22 play it again -- in Exhibit 1, in the video that we  
23 showed earlier, is -- one of the bullet points was:  
24 Causal data are largely unavailable.

25 Do you remember those words from your

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1 slides, or do you need to see them again?

2 A. Sorry. I'm being distracted. Can you  
3 say that again?

4 Q. Yes.

5 Do you remember seeing the bullet point  
6 on your slide from the video clip in Exhibit 1  
7 where the bullet point said: Causal data are  
8 largely unavailable?

9 A. I saw that on the slide.

10 Q. Okay. And those were your slides,  
11 right?

12 A. Those are slides that my colleague and  
13 I have put together.

14 Q. Well, you got up and presented them,  
15 yes?

16 A. We present that talk together.

17 Q. Okay. And -- well, do you vouch for  
18 the contents of the slides?

19 MS. COUCH: Object to the form.

20 THE WITNESS: We made those slides  
21 together.

22 BY MS. JONES:

23 Q. Were they accurate as you presented  
24 them to whomever the audience was for that  
25 particular talk?

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A. I would have to know the details. You did not provide that to me.

Q. I'm sorry. Are you suggesting that there might be bullet points in that slide deck that you presented that aren't accurate?

A. I would not say that.

Q. Okay. One of the bullet points was: Causal data are largely unavailable.

You remember that bullet point, yes?

A. I remember that bullet point.

Q. Was that bullet point accurate when you gave that talk?

A. That bullet point was -- without the full context of seeing the talk, which you did not provide, was in the context of prior literature that had not yet established some of the causal claims.

And then we go on, if you would show the full context of the talk, to show all of the causal data that we have since been able to provide based on longitudinal methods, within-person designs, brain imaging techniques, and so on.

Q. When you -- you signed the first page of your expert report, Exhibit 2; is that right?

A. Yes.

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Q. When you signed your expert report, did you understand yourself to be committing that you would not come into court and say things to the jury that you had not been willing to say out in your life in the real world?

MS. COUCH: Objection. Misstates the purpose of the report.

THE WITNESS: I don't understand your question.

BY MS. JONES:

Q. Okay. My question was: Do you believe that you have a responsibility, when you are testifying before a jury in this case, to be consistent with what you have said outside of this case?

MS. COUCH: Objection. Calls for speculation.

THE WITNESS: I believe that my report is my opinion, based on the totality of everything that I have done, including based on my education, talking to parents, talking to teenagers, doing a thorough review of the literature, conducting research myself on this topic, as well as seeing the -- the data from defense that this is my opinion.

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BY MS. JONES:

Q. And when you -- if you eventually testify as a witness at -- at a trial, are you going to include some of the statements that you said outside of the context of this case?

Like: Causal data are largely unavailable because it is oftentimes hard to say with some of our methods that social media causes some of these outcomes. Are you going to tell the jury that?

MS. COUCH: Objection. Dr. Telzer does not know what she'll be asked to talk about at trial if she is asked to go to trial.

THE WITNESS: I cannot tell you what the future trial holds.

BY MS. JONES:

Q. Are there any other -- and we'll talk about the materials considered list in a minute. But are there any other documents that you need to offer your opinions in this case?

A. I do not need any further documents to offer my opinions.

Q. Okay. You've -- you've done all the work you think you need to do in order to testify before a jury?

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MS. COUCH: Object to the form. Calls for a legal conclusion. However, her opinion as provided in her reports --

MS. JONES: Counsel, you are -- you are now testifying. You've made your objection. I would love for the witness to answer my question.

BY MS. JONES:

Q. Let me go back to my question, Doctor. Have you done all the work that you think you need to do to be able to testify before a jury?

MS. COUCH: Objection. Calls for a legal response.

THE WITNESS: I've done all the work that I need to reach my opinion for the purposes of this report.

BY MS. JONES:

Q. Do you anticipate doing any more work before you are called to testify at a trial?

A. I cannot tell you what the future holds.

Q. Have you been asked to do any more work before you testify at a trial?

A. I have not been asked to do anything.

Q. You've already told me you've never been deposed before. Have you ever testified at a

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1 trial?

2 A. No.

3 Q. Have you ever been retained to serve as  
4 an expert in any capacity?

5 A. Not outside of this group, no.

6 Q. Okay. Have you ever previously served  
7 as a consultant in any capacity with respect to  
8 litigation, putting aside what you're doing here?

9 A. No.

10 Q. Okay. Let me ask you. I think as part  
11 of your report we -- your report includes an  
12 Exhibit A, which is your resume or CV; is that  
13 right?

14 A. Yes.

15 Q. Okay. Is that Exhibit A to your report  
16 up-to-date?

17 A. I don't believe so.

18 Q. Okay. What is it missing?

19 MS. COUCH: For the record, we provided  
20 an updated CV either yesterday or the day before.

21 MS. JONES: It was -- it was yesterday.  
22 And it was not clear what was changed, although we  
23 asked.

24 BY MS. JONES:

25 Q. Do you know what your counsel provided

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1 yesterday?

2 A. My updated CV was provided yesterday.

3 Q. Okay. What's the difference between  
4 the two?

5 A. You can see the revision date at the  
6 top. This one was revised in April. My current  
7 one was revised as of a day or two ago.

8 Q. What's the difference?

9 A. The difference would be the recent  
10 publications that have come out. I can't speak to  
11 the specific differences, but it does have -- more  
12 publications have come out since the 1st of April.

13 Q. Is there anything else in your -- in  
14 the Exhibit A to Exhibit Number 2 to the deposition  
15 that is missing or otherwise inaccurate, putting  
16 aside the additional publications?

17 A. I don't believe my CV is inaccurate, if  
18 that's what you're asking.

19 Q. Well, my question is simply: Other  
20 than the additional publications, is there anything  
21 else that's different between the copy of your CV  
22 that we received in April and the copy that we  
23 received last night?

24 A. There may be differences. I update  
25 the -- the totality of my CV, including conferences

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1 and talks and other things.

2 Q. Right. So I'm now asking you: What  
3 other differences exist between the CV that we got  
4 in April and the one that we got last night?

5 MS. COUCH: Objection. Calls for  
6 speculation. She doesn't have the documents in  
7 front of her.

8 THE WITNESS: Hold them in front of me,  
9 and we can do a line-by-line comparison --

10 BY MS. JONES:

11 Q. So you don't know right this moment; is  
12 that right?

13 A. I cannot tell you line by line what is  
14 different other than additional publications and  
15 presentations and talks that I have done.

16 Q. Dr. Telzer, you have a master's degree  
17 and a Ph.D. in psychology; is that right?

18 A. Yes.

19 Q. Do you have any other advanced degrees?

20 A. No.

21 Q. You are not a medical doctor; is that  
22 right?

23 A. I'm not a medical doctor, but I  
24 collaborate with and advise medical doctors.

25 Q. Sure. But my question was about you.

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1 You are not a medical --

2 A. I am not a medical doctor.

3 Q. -- doctor, correct?

4 You cannot -- we can't talk at the same  
5 time.

6 You are not a medical doctor, correct?

7 A. Correct.

8 Q. And that means you're not a  
9 psychiatrist, right?

10 A. I am not a psychiatrist.

11 Q. You are not authorized to, for example,  
12 prescribe medications to treat conditions like  
13 depression or anxiety or bipolar disorder or  
14 schizophrenia, right?

15 MS. COUCH: Asked and answered.

16 THE WITNESS: I am not a medical doctor  
17 and I do not prescribe medications.

18 BY MS. JONES:

19 Q. Okay. And have you ever treated  
20 patients as part of your work?

21 A. I am not a clinician who treats  
22 patients.

23 Q. So is that a "no," you've never treated  
24 patients?

25 A. No, I have not treated patients. I am

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1 not a clinician.

2 Q. So that means you don't make diagnoses  
3 for patients -- actual patients who might have  
4 certain mental health disorders, correct?

5 MS. COUCH: Asked and answered.

6 THE WITNESS: I am not a medical doctor  
7 who makes or diagnoses patients.

8 BY MS. JONES:

9 Q. And so you have never, for example,  
10 diagnosed a patient with clinical depression or  
11 clinical anxiety?

12 MS. COUCH: Asked and answered.

13 THE WITNESS: I am not a medical doctor  
14 or a clinician who diagnoses patients.

15 BY MS. JONES:

16 Q. Yeah. And -- and I just need an answer  
17 to my specific question.

18 You have never diagnosed a patient with  
19 clinical depression or clinical anxiety; is that  
20 right?

21 MS. COUCH: Asked and answered.

22 THE WITNESS: I am not a medical doctor  
23 or a clinician who diagnoses patients.

24 BY MS. JONES:

25 Q. And that includes conditions like

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1 depression and anxiety?

2 MS. COUCH: Asked and answered.

3 THE WITNESS: I do not make medical  
4 diagnoses.

5 BY MS. JONES:

6 Q. For any age group; is that right?

7 MS. COUCH: Asked and answered.

8 THE WITNESS: I am not a medical doctor  
9 or a clinician who diagnoses for any age group.

10 BY MS. JONES:

11 Q. You -- you have as part of your work  
12 reviewed brain scans, right?

13 A. Please clarify what you mean by  
14 "reviewed brain scans."

15 Q. Well, for example, you have papers  
16 where you talk about looking at fMRIs, yes?

17 A. I conduct research using fMRI  
18 methodology.

19 Q. Okay. Have you ever in any setting  
20 reviewed an fMRI to make a clinical diagnosis of  
21 some kind?

22 A. We do not review fMRI scans to make a  
23 medical diagnosis of an individual.

24 I conduct fMRI research on large  
25 populations to understand relationships among

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1 different variables of interest, like the effects  
2 of social media on brain development in a large  
3 sample of adolescents.

4 Q. Do you -- do you know whether it would  
5 be possible to look at a brain scan and actually  
6 make a clinical diagnosis of a mental health  
7 condition?

8 A. That is outside of the field in which I  
9 conduct this type of research.

10 Q. So you don't know one way or the other  
11 whether that's how brain scans are used?

12 A. It is not my understanding that we can  
13 conduct an fMRI scan on an individual and make,  
14 based on an fMRI scan, a diagnosis.

15 Q. Okay. And -- and there's not a way on  
16 an fMRI scan to, for example, determine what  
17 specific external stimuli might have caused a  
18 portion of the brain to activate, right?

19 A. I don't understand your question.

20 Q. Well, my question is -- for example, on  
21 some of your publications, you have images of -- of  
22 brain scans, yes?

23 A. We don't have images of brain scans.

24 We have images of -- of our -- the brain scans are  
25 a compilation of hundreds of data points, and we

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1 show the statistical maps of those brain scans.

2 Q. Sure. But sometimes you will show  
3 images that actually show certain portions of the  
4 brain that seem to have been activated by some  
5 stimuli, correct?

6 A. Yes.

7 MS. COUCH: Asked and answered.

8 THE WITNESS: We show the activation  
9 maps, the statistical maps of activation of those  
10 brain imaging scans that we conduct across a large  
11 sample of adolescents.

12 BY MS. JONES:

13 Q. Right. That's helpful.

14 So -- but you could not look at one of  
15 those scans and determine, I know for sure what it  
16 was that caused that activation, could you?

17 MS. COUCH: Asked and answered.

18 THE WITNESS: I don't understand your  
19 question. That's not how we run the analysis.

20 BY MS. JONES:

21 Q. Well, my question is: There's not a --  
22 a -- there's not a specific visual that you get  
23 when you're evaluating those scans where you could  
24 say, I know that that was the result of social  
25 media versus spending time with family versus

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1 hanging out with friends, right?

2 MS. COUCH: Asked and answered.

3 THE WITNESS: We conduct very  
4 well-controlled experimental tasks that help us to  
5 conduct statistical analyses, and we can state with  
6 confidence what we're seeing in the adolescent  
7 brain.

8 I don't understand what your question  
9 specifically is asking. But those are very  
10 well-controlled studies to be able to -- be able to  
11 understand what's happening in the brain.

12 BY MS. JONES:

13 Q. Well, my -- my question, I guess, is  
14 whether there's a way to know, based on those  
15 analyses, what the specific thing was that caused  
16 what you're saying.

17 A. Absolutely. We do very well-controlled  
18 studies. Our fMRI tasks are based on experiments  
19 with very strong controls where we know exactly  
20 what we are seeing in the brain when it's being  
21 activated by controlling and conducting analyses in  
22 very controlled ways.

23 Q. And I take it, from what you said  
24 earlier, that you have never, in part of your -- as  
25 part of your work, used an fMRI scan of some kind

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1 to say about a specific individual teenager that  
2 that teenager's brain had been somehow affected by  
3 social media?

4 A. Like I said, we don't look at an  
5 individual to make a diagnosis of their fMRI scan.  
6 We conduct well-controlled studies across hundreds  
7 of adolescents to understand activation maps in the  
8 brain across a population of adolescents.

9 Q. So the work that you're doing is not  
10 focused on any particular teenager?

11 MS. COUCH: Object to the form. Asked  
12 and answered.

13 BY MS. JONES:

14 Q. That's what you mean when you say  
15 "population level," yes?

16 A. What I mean is that we do -- we do  
17 research in a sample of adolescents, and we use  
18 that sample of adolescents to understand patterns  
19 that we can infer or generalize to other  
20 adolescents.

21 Q. If you didn't know what controlled task  
22 was being done, you wouldn't be able to identify it  
23 from the image, right?

24 MS. COUCH: Objection. Incomplete  
25 hypothetical.

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1 THE WITNESS: I don't know what you're  
2 asking.

3 BY MS. JONES:

4 Q. Well, you said, the way we determine  
5 that the results of the scans were caused by some  
6 particular input was we have very controlled tasks  
7 that we give people, right?

8 A. Yep.

9 Q. Yes?

10 A. Absolutely, we control very good  
11 experimental tasks.

12 Q. Yes.

13 But if you did not know what the  
14 controlled task was that was being done, you  
15 wouldn't be able to tell just from looking at the  
16 image what the --

17 A. Of course we would know what --

18 Q. -- task was --

19 A. -- our control --

20 MS. COUCH: Dr. Telzer, let me get my  
21 objection, okay? So take just a second.

22 Incomplete hypothetical. Vague.

23 THE WITNESS: Can you repeat your  
24 question, please?

25 BY MS. JONES:

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1 Q. Sure.

2 If you didn't know what the controlled  
3 task was that was being done, you wouldn't be able  
4 to just look at the image and say, I know what the  
5 thing was that the person had been doing?

6 MS. COUCH: Incomplete hypothetical.  
7 Vague.

8 THE WITNESS: I -- I'm having a hard  
9 time speculating on this. I would need a specific  
10 example.

11 BY MS. JONES:

12 Q. So if you got an image -- let's say --  
13 put aside that you've given the participants in  
14 your study a set of controlled tasks. Let's put  
15 that to the side. Let's say you just got the image  
16 that you all eventually evaluate, yes? Are you  
17 with me?

18 A. Maybe.

19 Q. Okay.

20 A. I'd like to hear where you're going.

21 Q. Okay.

22 A. I don't understand yet.

23 Q. If you didn't know anything about what  
24 the tasks were that the participants had been  
25 engaged in, and you just got the image, would you

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1 be able to make any informed judgments about what  
2 had led to what you are able to see on that image?

3 MS. COUCH: Incomplete hypothetical.  
4 Calls for speculation. Vague.

5 THE WITNESS: In no context would I not  
6 know what the experimental task was.

7 BY MS. JONES:

8 Q. Well, I'm -- I'm asking you if there's  
9 a way, independent of having control over the task,  
10 that you could just look at an image and say, "Oh,  
11 I know what it was that led to that reaction"?

12 A. In no --

13 MS. COUCH: Object to the form.

14 Let me get my objection in, Dr. Telzer.

15 Calls for speculation. Incomplete  
16 hypothetical.

17 THE WITNESS: In no context would I  
18 look at an image without understanding the full  
19 experimental task that was done.

20 BY MS. JONES:

21 Q. Because you would need -- you would  
22 need to know the experimental task, it sounds like?

23 MS. COUCH: Object to the form. Calls  
24 for speculation.

25 BY MS. JONES:

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1 Q. To get to the outcomes that you have  
2 reported in your studies, right?

3 MS. COUCH: Same objection. Calls for  
4 speculation. Incomplete hypothetical.

5 THE WITNESS: I would need a specific  
6 example to be able to answer this.

7 BY MS. JONES:

8 Q. Well, we may not -- we -- I think we're  
9 talking past each other.

10 My question is simply: Do you have to  
11 know information about what the person was doing to  
12 be able to know whether it was connected to the  
13 image?

14 MS. COUCH: Asked and answered. Calls  
15 for conjecture.

16 THE WITNESS: This --

17 MS. COUCH: Incomplete hypothetical.

18 THE WITNESS: Yeah, I'm sorry. This  
19 barely makes sense. So I'm not able to answer it.  
20 It's very speculative.

21 BY MS. JONES:

22 Q. Okay. And you can't tell me today, it  
23 sounds like, because you're struggling with the  
24 hypothetical, whether just looking at the image,  
25 without knowing the tasks, if you can know what

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1 might have caused activation in a certain portion  
2 of the brain?

3 MS. COUCH: Asked and answered. Calls  
4 for conjecture. Incomplete hypothetical.

5 THE WITNESS: As I said, I cannot  
6 speculate on this. I need a specific example.  
7 This does not make sense.

8 BY MS. JONES:

9 Q. Okay. Have you ever made a diagnosis  
10 of addiction in any patient?

11 MS. COUCH: Asked and answered.

12 THE WITNESS: I am not a clinician. I  
13 don't make diagnoses of patients, but my research  
14 informs the work of clinicians.

15 BY MS. JONES:

16 Q. You know that there are healthcare  
17 providers and clinicians who do specialize in  
18 treating and diagnosing addiction, yes?

19 MS. COUCH: Asked and answered.

20 THE WITNESS: I am aware that there are  
21 clinicians who diagnose this, and I work with them  
22 and talk to them and consult with them all the  
23 time.

24 BY MS. JONES:

25 Q. Sure. But you don't, as yourself,

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1 Dr. Telzer, hold yourself out as someone who  
2 specializes in treating and diagnosing addiction,  
3 do you?

4 MS. COUCH: Asked and answered.

5 THE WITNESS: I am not a clinician. I  
6 do not treat and diagnose disorders.

7 BY MS. JONES:

8 Q. Okay. And you don't have any special  
9 expertise in any individual mental health disorder  
10 from a clinical perspective?

11 A. I am not a clinician --

12 MS. COUCH: Asked and answered.

13 THE WITNESS: Whoops. Sorry.

14 I am not a clinician, but I collaborate  
15 with, work with, talk to clinicians. I work with  
16 adolescents and hear about mental health disorders  
17 all the time. I use well-validated measures that  
18 are based on clinical disorders. And so I am  
19 well -- I understand and can provide expertise on  
20 this topic.

21 BY MS. JONES:

22 Q. You -- you don't have a degree in  
23 epidemiology, do you?

24 A. I do not have a degree in epidemiology.

25 Q. Okay. And you -- in your report and in

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1 your CV, you don't describe yourself as being an  
 2 epidemiologist, correct?  
 3 A. I am not an epidemiologist.  
 4 Q. Okay. Have you ever designed or  
 5 conducted a randomized controlled trial?  
 6 A. I have not designed and randomized --  
 7 designed -- I have not designed a randomized  
 8 controlled trial.  
 9 Q. Have you ever designed or conducted a  
 10 prospective cohort study?  
 11 A. A prospective cohort study? Can you  
 12 define what you mean by a "prospective cohort  
 13 study"?  
 14 Q. Do you know what a prospective cohort  
 15 study is?  
 16 A. I would like to know your definition of  
 17 that to be able to answer it.  
 18 Q. I actually get to ask you the  
 19 questions. Do you know what a prospective cohort  
 20 study is?  
 21 A. Yes.  
 22 Q. Okay.  
 23 MS. COUCH: Asked and answered.  
 24 Argumentative. If she wants to make sure that you  
 25 guys are on the same page, that's fair.

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1 MS. JONES: Sure.  
 2 MS. COUCH: Dr. Telzer, just make sure  
 3 to pause and let me get my objection in because  
 4 there's a realtime going that's taking the  
 5 transcript and I can see it's not getting  
 6 everything.  
 7 BY MS. JONES:  
 8 Q. Do you know what a prospective cohort  
 9 study is?  
 10 A. Yes.  
 11 Q. What is your understanding of what a  
 12 prospective cohort study is?  
 13 A. If we're talking about a prospective  
 14 longitudinal cohort study, it's following a sample  
 15 of individuals across time.  
 16 Q. Okay. Have you ever been responsible  
 17 for designing or conducting a prospective cohort  
 18 study?  
 19 A. I have designed and conducted  
 20 prospective longitudinal cohort designs.  
 21 Q. Outside of conducting longitudinal  
 22 studies, have you ever designed or conducted a  
 23 prospective cohort study?  
 24 A. Can you please give me your definition  
 25 of a prospective cohort study so I can --

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1 Q. I'm -- I want to -- I want to make sure  
 2 I have an understanding about what you've done.  
 3 You've talked about doing prospective longitudinal  
 4 cohort studies.  
 5 A. Uh-huh.  
 6 Q. Beyond that, have you done any work in  
 7 terms of designing or conducting a prospective  
 8 cohort study?  
 9 MS. COUCH: Vague.  
 10 THE WITNESS: I don't know what you  
 11 mean by "prospective cohort study."  
 12 BY MS. JONES:  
 13 Q. Are you familiar with what's known as a  
 14 "Bradford Hill analysis"?  
 15 A. I am not familiar with that.  
 16 Q. So I take it you've never done a  
 17 Bradford Hill analysis, yes?  
 18 A. I can't tell you if I've done it. But  
 19 I don't know what you mean by "Bradford Hill  
 20 analysis."  
 21 Q. Okay. And I take it you did not do a  
 22 Bradford Hill analysis for purposes of your work in  
 23 this case, yes?  
 24 A. I cannot tell you what a Bradford Hill  
 25 analysis is.

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1 Q. You don't have a degree in public  
 2 health, do you?  
 3 A. I do not have a degree in public  
 4 health.  
 5 Q. You are being paid by the lawyers for  
 6 the plaintiffs in this case, correct?  
 7 A. Yes.  
 8 Q. And -- and just so we're clear, the --  
 9 the money that you are billing to the lawyers,  
 10 that's money that you are personally holding on to.  
 11 You're not giving that back to UNC or giving it to  
 12 somebody else, are you?  
 13 A. This is work I'm doing outside of my  
 14 work for UNC.  
 15 Q. That's not -- actually, my question was  
 16 different.  
 17 My question is: To the extent you have  
 18 been paid by the lawyers in this case, is that  
 19 money that you are personally holding on to?  
 20 A. Yes.  
 21 Q. When were you first retained?  
 22 A. I don't have the specific date on top  
 23 of my head. I started talking with Matt Bergman in  
 24 '23, mid '23. Talked with the -- the -- the  
 25 broader group perhaps in June of '24. Retained

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1 somewhere in between that.

2 Q. Yeah. Let me not -- not test your  
3 memory too much.

4 A. Thank you.

5 (TELZER EXHIBIT 3, Invoices of Dr.  
6 Telzer, Bates TELZER0001-016, was marked for  
7 identification.)

8 BY MS. JONES:

9 Q. Let me hand you what's been marked as  
10 Exhibit Number 3, which is a set of -- just for the  
11 record, a set of invoices that were produced to us  
12 by your lawyers here today.

13 A. Uh-huh.

14 Q. Have you -- have you seen Exhibit 3  
15 before?

16 A. Yes. I made this.

17 Q. Okay. You -- you generated Exhibit  
18 Number 3?

19 A. I believe so. Let me scroll through  
20 the entire thing. But, yes, these are my invoices.

21 Q. And does Exhibit Number 3 reflect all  
22 of the invoices that you have submitted to the  
23 lawyers for the plaintiffs up through June 1st of  
24 2025?

25 A. Yes.

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1 Q. Okay. Have you done work since  
2 June 1st of 2025 that's not reflected in Exhibit  
3 Number 3?

4 A. Yes.

5 Q. How much? And let me -- I should be  
6 more specific. How much in terms of hours since  
7 June the 1st?

8 A. I've had a few meetings and done a  
9 little bit of additional research on documents.

10 Q. I said "how much in terms of hours."  
11 How many hours does that entail?

12 A. I don't think I can tell you off the  
13 top of my head how many hours. Maybe --

14 Q. Is it more or less than five?

15 A. More than five.

16 Q. Is it more or less than ten?

17 A. More than ten.

18 Q. Is it more or less than 20?

19 A. Less than 20.

20 Q. So is it somewhere between 10 and 20?

21 A. Yes.

22 Q. Is it more or less than 15?

23 A. I don't think I can get that  
24 nitty-gritty.

25 Q. That's fair. So between June 1st and

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1 today -- of 2025, June 1st of 2025, and today,  
2 you've done somewhere between 10 and 20 additional  
3 hours on top of the hours that are reflected in  
4 Exhibit Number 3; is that right?

5 A. That's correct.

6 Q. Okay. And that gets up -- us right up  
7 to today; is that right?

8 A. Uh-huh.

9 Q. And -- you have to say "yes" or "no"  
10 for the court reporter.

11 A. Yes.

12 Q. Okay. Do you -- what did you do to  
13 prepare for this deposition? And then we'll talk  
14 about Exhibit 3 and specifics.

15 MS. COUCH: And, Dr. Telzer, you can  
16 tell her if you met with us. But don't talk about  
17 our conversations.

18 THE WITNESS: Uh-huh.

19 BY MS. JONES:

20 Q. Yeah. I don't want to know about your  
21 conversations.

22 A. I've had a few meetings with the  
23 attorneys. I've reviewed my materials.

24 Q. How many meetings with the attorneys?

25 A. I believe three meetings.

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1 Q. When were those?

2 A. Monday, Tuesday, Wednesday.

3 Q. Of this week?

4 A. Yes.

5 Q. How long did those last?

6 A. Between an hour and a half and seven  
7 hours.

8 Q. Help me understand that. Was it -- how  
9 much time did you spend on Monday prepping --

10 A. An hour and a half.

11 Q. Okay. What about Tuesday?

12 A. Four hours.

13 Q. And what about Wednesday?

14 A. Sevenish hours.

15 Q. Okay. So just slightly above 12-1/2  
16 hours?

17 A. Uh-huh.

18 Q. Okay. You have to say "yes" or "no"  
19 for the court reporter.

20 A. I did not do the math, so I can't say  
21 "yes" or "no." But if -- if you just did the math,  
22 sure.

23 Q. You said one and a half hours on  
24 Monday, four hours on Tuesday, seven hours  
25 yesterday?

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1 A. If that adds to about 12-1/2, sure.  
 2 Q. Well, I think it adds up to 12-1/2.  
 3 A. Okay.  
 4 Q. Okay.  
 5 A. I did not do the math.  
 6 Q. Okay. We're not going to fight about  
 7 that, it sounds like.  
 8 Okay. You met with counsel. Did you  
 9 review any documents in preparation for your  
 10 deposition?  
 11 A. No, I don't believe so. Not beyond  
 12 what's in my report.  
 13 Q. And before Monday of this week, had you  
 14 done anything to prepare for your deposition?  
 15 A. Before Monday of this week?  
 16 Q. Yes.  
 17 A. You mean between this date and -- and  
 18 Monday?  
 19 Q. I'm not sure what you mean by "this  
 20 date."  
 21 A. I don't know what you mean by "before  
 22 Monday."  
 23 Q. You told me that, in advance of your  
 24 deposition, that you prepped with counsel Monday,  
 25 Tuesday, Wednesday, yes?

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1 A. Yes.  
 2 Q. Of this week, yes?  
 3 A. Of this week, yes.  
 4 Q. Prior to Monday of this week, was there  
 5 anything that you did to prepare for your  
 6 deposition?  
 7 A. I had a couple of short meetings with  
 8 counsel.  
 9 Q. So additional meetings?  
 10 A. Yes.  
 11 Q. Prior to this week?  
 12 A. Yes.  
 13 Q. Okay. When were those?  
 14 A. In May.  
 15 Q. Okay. When you say "short," how short  
 16 were they?  
 17 A. An hour.  
 18 Q. And who were the lawyers you were  
 19 meeting with?  
 20 A. Sara Couch.  
 21 Q. Anybody else?  
 22 A. These three.  
 23 Q. Okay. I know Mr. Bergman, of course.  
 24 A. Nelson.  
 25 Q. Nelson, yes. Okay. Anybody else?

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1 A. Yes. Names are not my -- other people  
 2 on their team.  
 3 Q. You won't be the first witness --  
 4 A. Sorry.  
 5 Q. -- who forgot the names of their  
 6 lawyers. So that's okay if you don't remember.  
 7 But do you remember roughly how many  
 8 additional lawyers you met with?  
 9 A. One other.  
 10 Q. Okay. Independent of meeting with the  
 11 lawyers and reviewing what you have in your binder  
 12 there, was there anything else that you did to  
 13 prepare for your deposition?  
 14 A. Other than meeting with my lawyers and  
 15 reviewing this?  
 16 Q. Yes.  
 17 A. Is there anything else that I did? I  
 18 don't believe so.  
 19 Q. Okay. When you were first retained in  
 20 2023 -- just referring back to Exhibit Number 3.  
 21 The first item that's reflected on that invoice,  
 22 which is dated June 20th, 2023, is for June the 8th  
 23 of 2023.  
 24 Do you see that?  
 25 A. Yes.

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1 Q. And do you remember how far in advance  
 2 of that first billing you were reached out to by  
 3 Mr. Bergman?  
 4 A. I don't recall. Probably close to that  
 5 date.  
 6 Q. And without -- I don't want to know the  
 7 details. But was the consultation services  
 8 reflected on the first page of Exhibit Number 3,  
 9 was that just a call or a meeting with Mr. Bergman?  
 10 A. Uh-huh.  
 11 Q. You have to say "yes" or "no."  
 12 A. Yes.  
 13 Q. Do you have any idea -- and again, I  
 14 don't -- don't share with me any communications  
 15 you've had with your lawyers.  
 16 But do you have any sense of how you  
 17 were identified as a potential expert in the case?  
 18 A. I do not.  
 19 Q. And you've, obviously, read for me a  
 20 paragraph from your report.  
 21 But as of that time in June of 2023,  
 22 what did you understand your role was going to be  
 23 as an expert in the litigation?  
 24 A. I had no idea at that time nor for  
 25 probably close to another year what that role would

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1 be.

2 Q. Okay. What happened a year out? Were  
3 you --

4 MS. COUCH: Object to the form. I  
5 think that's going to get into attorney-client --  
6 or attorney confidential communications here.

7 BY MS. JONES:

8 Q. I don't want to know conversations.  
9 But was there a -- a meeting that occurred where  
10 somehow you have more full sense of what your role  
11 was?

12 MS. COUCH: Objection. I'm going to  
13 instruct her not to answer because that would  
14 necessarily entail communications with client --  
15 or excuse me -- with attorney.

16 BY MS. JONES:

17 Q. Okay. When you started in June of  
18 2023, you didn't really know what your role was  
19 going to be?

20 A. I did not know.

21 Q. Okay. And you've already testified  
22 that it was not until a year later that you  
23 understood what your role was going to be?

24 A. I may have started to understand it a  
25 year later.

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1 Q. Okay. Does Exhibit Number 3 reflect  
2 all of your work to date up through June the 1st, I  
3 guess?

4 A. Yes.

5 Q. And when you were first retained in  
6 2023 -- again, I don't want to get into a lot of  
7 details about your communications with counsel, but  
8 did you have an understanding about what the core  
9 claim was in the litigation?

10 MS. COUCH: Objection. That calls for  
11 communications with the attorney.

12 I'm going to instruct you not to  
13 answer.

14 BY MS. JONES:

15 Q. Well, let me ask you this way: Did you  
16 understand that the core claim in the case was that  
17 social media was causing mental health harms for  
18 teenagers?

19 MS. COUCH: Objection. Calls for  
20 communications with the attorney.

21 I'm going to instruct her not to  
22 answer.

23 BY MS. JONES:

24 Q. Is it the case that in -- when you were  
25 contacted in June of 2023 by Mr. Bergman, that

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1 sometime in advance of that you had actually been  
2 on the news here in -- I think it was technically  
3 WRAL, saying, "We don't yet know that social media  
4 is causally linked to depression"?

5 MS. COUCH: Objection.

6 BY MS. JONES:

7 Q. Do you recall saying that?

8 MS. COUCH: Calls for speculation.

9 THE WITNESS: I'd have to see it.

10 BY MS. JONES:

11 Q. Okay. We'll come back to that. But  
12 you don't remember back in 2023 saying that on the  
13 news?

14 A. I'd have to see --

15 Q. Okay. You will.

16 Let me ask you about some of the  
17 entries in Exhibit Number 3. Go for me, if you  
18 would, to what is marked in the bottom right-hand  
19 corner as TELZER0003. And that is Invoice Number  
20 3.

21 A. Uh-huh.

22 Q. Yes?

23 A. Yes.

24 Q. And as far as I can tell -- although  
25 there's not a specific year associated with these

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1 entries, I think this is for October of 2023. Does  
2 that sound right?

3 MS. COUCH: Objection. Misstates the  
4 date on the invoice.

5 BY MS. JONES:

6 Q. Well, I know what -- I know what the  
7 invoice date says. I don't think that would be the  
8 right date, if you actually look at the document.  
9 You're welcome to flip through the pages, but I  
10 think this is October of 2023. You can tell me if  
11 I'm wrong.

12 A. It looks like the -- yeah, it looks  
13 like the -- sorry -- the dates at the top on these  
14 got modified. I think they automatically switched  
15 to the day I opened the document.

16 Q. Well, that's fine. I -- I had the  
17 impression -- but you can tell me that I'm wrong,  
18 but the -- the date of the invoice itself doesn't  
19 necessarily -- at least for purposes of the year,  
20 does not correspond necessarily to the entries in  
21 the invoice in terms of the timing of the work.

22 So on Page 3, for example, as I said, I  
23 think these are -- these dates from October refer  
24 to 2023, but you should tell me if I've gotten that  
25 wrong.

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1 A. I think they refer to '24, but I'm not  
2 positive.

3 Q. Well, let me -- let me ask you about  
4 that, then. Because if you turn to Page 7, there  
5 are a bunch of October dates.

6 A. Yes.

7 Q. Did you prepare these invoices,  
8 Dr. Telzer?

9 A. Yeah, I -- I did. It looks like the --  
10 I'm sorry -- the -- the -- when I PDF'd it, the  
11 date got modified. So I'm just grappling with  
12 that, but sorry.

13 Q. No, that's okay. I, too, was grappling  
14 with it. What I think happened is that the invoice  
15 date may not have any -- may not correspond  
16 necessarily with the timing of the work reflected  
17 on the page. That was just -- if you flip through  
18 it, it's chronological but for that issue.

19 A. I can tell you that starting at  
20 Invoice 4 was with the work for the broader group.  
21 Invoices 1 to 3 were for Matt Bergman's --

22 Q. Just -- just Mr. Bergman's firm?

23 A. Yeah.

24 Q. Okay. That's helpful.

25 So on Page 3, there's a reference to

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1 meeting with Buffalo group.

2 A. Yeah.

3 Q. Which would have still been within  
4 the -- what I'll describe as the "Bergman period."  
5 What does "Meeting with Buffalo group" refer to?

6 A. Meeting with Matt's group of folks.

7 Q. Okay. And then you said on Page 4 of  
8 Exhibit Number 3 is when you started meeting with a  
9 different group of attorneys?

10 A. With what I referred to, perhaps,  
11 before understanding the context of JCCP as the  
12 MDL.

13 Q. Okay. On Page Number 4, there's a  
14 reference to "consulting services." What does that  
15 refer to specifically?

16 A. I can't recall back to that date.  
17 Probably reviewing literature.

18 Q. There's also various references to  
19 "prep work."

20 A. Uh-huh.

21 Q. What does that refer to?

22 A. To getting things ready for a meeting.

23 Q. And when you say "getting things  
24 ready," what does that mean?

25 A. I don't know if I'm able to give

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1 specifics of what I prepped.

2 MS. COUCH: If it would go into  
3 attorney-client communications, no. If it's  
4 just -- if you're just going to say, "I generally  
5 reviewed literature," I think that's okay. But  
6 don't get into any specific details, any questions,  
7 any conversations, any communications.

8 THE WITNESS: Yeah.

9 MS. COUCH: That's all privileged, and  
10 every counsel here is aware of that.

11 THE WITNESS: Yeah. Yeah.

12 Reviewing literature, preparing things  
13 to discuss and show when I met with them.

14 BY MS. JONES:

15 Q. Okay. And then further down on Page 4  
16 of Exhibit 3, there's a section that -- at some  
17 point, it looks like your colleague, Dr. Burnell --

18 A. Yes.

19 Q. -- became part of your work in the  
20 case?

21 A. At that time, I was invited to bring  
22 other colleagues of mine to this meeting.

23 Q. Okay. And what was her role intended  
24 to be?

25 MS. COUCH: And my objection would be,

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1 just -- if you know without conveying  
2 attorney-client communications, which I don't know  
3 that you would, you can answer. But if it would be  
4 because of attorney-client communications, I would  
5 instruct you not to answer.

6 THE WITNESS: Yeah.

7 MS. COUCH: Excuse me.

8 Attorney-expert.

9 THE WITNESS: Yep.

10 She, in this context, was helping to  
11 pull the literature and prepare as well for some of  
12 the topics we were going to discuss.

13 BY MS. JONES:

14 Q. To the extent that there were -- there  
15 are amounts in your invoices that are captured  
16 in -- for Dr. Burnell --

17 A. Uh-huh.

18 Q. -- are those amounts that are being  
19 paid to her personally or are those amounts that  
20 are being paid to you?

21 A. Those are being paid to Burnell  
22 directly.

23 Q. Okay. I just wanted to ask you about a  
24 few more entries in here. On Page 5 of Exhibit  
25 Number 3, there's a reference to "paperwork" on

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1 July the 8th. What is that?

2 MS. COUCH: I repeat the same  
3 objection.

4 You can answer, but you can't have  
5 communications.

6 THE WITNESS: That would be reading and  
7 signing some paperwork. I don't recall exactly  
8 what paperwork.

9 BY MS. JONES:

10 Q. On Page 8 of Exhibit 3, there are  
11 references to analyses by Dr. Burnell. What was  
12 that work?

13 A. I asked --

14 MS. COUCH: I would also -- same  
15 objections. Do not answer anything that gets into  
16 our communications in regards to report drafts. At  
17 this point, you're working on your report. That  
18 gets into our communications. At the highest  
19 level, I think you can describe Burnell's role.  
20 But --

21 THE WITNESS: Yeah.

22 MS. COUCH: -- do not get into specific  
23 communications or drafts in this report.

24 THE WITNESS: Yeah. Yeah.

25 Dr. Burnell -- under my guidance or

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1 under my supervision, I asked for her to run some  
2 analyses.

3 BY MS. JONES:

4 Q. Did you -- how did you communicate with  
5 Dr. Burnell? And what I'm asking is: Did you  
6 speak to her live in person? Did you email with  
7 her? How did you communicate with her about what  
8 she was doing in connection with your expert work  
9 in this case?

10 A. Our offices are right next to each  
11 other.

12 Q. Okay. Well, that's convenient.  
13 Did you ever communicate by email about  
14 the work that she was helping you with in this  
15 case?

16 MS. COUCH: Objection.

17 THE WITNESS: We have communicated by  
18 email.

19 BY MS. JONES:

20 Q. Okay. Were there any communications  
21 that you had with Dr. Burnell by email that did not  
22 include lawyers --

23 MS. COUCH: Objection. Calls for  
24 speculation.

25 BY MS. JONES:

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1 Q. -- about the work that you were doing  
2 in this case?

3 MS. COUCH: Same objections.

4 THE WITNESS: Were there any emails --  
5 can you repeat your question? Sorry.

6 BY MS. JONES:

7 Q. Yes. Sure.

8 Were there any communications that you  
9 had with Dr. Burnell by email that did not include  
10 lawyers on the email thread?

11 A. Yes.

12 MS. COUCH: Same objections.

13 THE WITNESS: Kaitlyn and I -- yes, we  
14 email.

15 BY MS. JONES:

16 Q. Including about the work that you were  
17 doing for this case?

18 MS. COUCH: Objection. Calls for  
19 speculation.

20 THE WITNESS: Kaitlyn and I email each  
21 other, yes.

22 BY MS. JONES:

23 Q. Yeah, I -- I -- I want to just make  
24 sure I understand your testimony.

25 I'm asking specifically for purposes of

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1 the work that you were doing in this case. Were  
2 there any email communications that you had with  
3 Dr. Burnell that did not include lawyers on the  
4 email?

5 MS. COUCH: Objection. Calls for  
6 speculation.

7 THE WITNESS: Yes.

8 BY MS. JONES:

9 Q. Were there any other communications --  
10 I suspect probably not if you were next to each  
11 other.

12 But were there any other written  
13 communications that you had with Dr. Burnell about  
14 the work in this case that did not include lawyers?

15 A. Were there other communications beyond  
16 in person or on email?

17 Q. Yes.

18 A. There may have been a call. Like, a  
19 phone call.

20 Q. Okay. Any texting back and forth about  
21 the work?

22 A. We have texted.

23 Q. About the work you're doing in this  
24 case?

25 A. Yes.

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1 Q. And did those text communications  
2 include lawyers?  
3 A. No.  
4 Q. Go to Page 11 for me of Exhibit 3.  
5 Down at the bottom of the page, there's  
6 a reference to "data management" and "reference  
7 management."  
8 Do you see that?  
9 A. Uh-huh. Yeah.  
10 Q. What are those -- what does "data  
11 management" refer to?  
12 A. I paid somebody to help compile a lot  
13 of data for myself.  
14 Q. Who was the person you were paying to  
15 do that?  
16 A. You need a name?  
17 Q. Yes.  
18 A. Her first name is Sara.  
19 Q. What is her last name?  
20 A. I would have to look it up.  
21 Q. What is her role? Is she a student?  
22 Does she have some other role at the -- the  
23 university?  
24 A. She's a staff member in my lab.  
25 Q. Okay. "Reference management," what

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1 does that mean?  
2 A. I paid somebody to help compile all the  
3 references for my report.  
4 Q. When you say you paid someone to  
5 compile the references in your report, what  
6 references are you -- you referring to  
7 specifically?  
8 A. In order to pull out the APA-formatted  
9 references of each of the things I cite in here.  
10 Q. And are you referring specifically to  
11 the -- the articles and literature that you cited?  
12 A. Yes.  
13 Q. Okay. Did you -- and tell me the name  
14 of that person.  
15 A. Her first name is Alexis.  
16 Q. What is her last name?  
17 A. I'd have to look it up.  
18 Q. Is this another person in your lab?  
19 A. Yes.  
20 Q. For the data management work that you  
21 asked for help with, what data did you have Sara in  
22 your lab helping to compile?  
23 A. It was pulling together as part of the  
24 data that I included some of the -- that was shared  
25 with you all the screenshots of phone usage.

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1 Q. And to the extent that "data  
2 management" and "reference management" are referred  
3 to in other places in your invoices -- for example,  
4 on Page 13 -- is that going to be the same thing?  
5 A. I believe so. Let me look.  
6 Q. On Page 13, Invoice 11.  
7 A. Yeah.  
8 Q. Is that going to be the same work  
9 involving the same people?  
10 A. Yep.  
11 Q. Okay. And to the extent that you  
12 had -- I think you said her name was Alexis helping  
13 you with pulling together references, did that  
14 have -- was she involved at all in things beyond  
15 the literature that you cite in your report?  
16 A. No.  
17 MS. COUCH: Misstates her testimony.  
18 THE REPORTER: I'm sorry. I can't hear  
19 you.  
20 MS. COUCH: I said, "Misstates her  
21 testimony."  
22 THE WITNESS: Restate the question,  
23 please.  
24 BY MS. JONES:  
25 Q. Oh. I thought you had already said --

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1 I thought you already answered that. I apologize.  
2 A. I didn't finish my answer because Sara  
3 put her objection in.  
4 Q. Okay.  
5 A. So I couldn't finish.  
6 Q. To the extent that Alexis was helping  
7 you pull together references -- which I think is  
8 what you testified to, correct?  
9 A. Alexis pulled together the APA  
10 references for the things cited in here, yes.  
11 Q. Yeah. And I -- I guess my question was  
12 really more focused on you didn't have her helping  
13 you with, like, for example, the documents from the  
14 defendants that --  
15 A. Oh. She did not have access to any of  
16 that.  
17 Q. Okay. Just let me finish my question.  
18 But I think -- I -- I understand. Okay.  
19 Dr. Telzer, I'm not sure if you've gone  
20 through the exercise of summing up the amounts that  
21 you spend in terms of time devoted to different  
22 things. Have you?  
23 A. I have not.  
24 Q. Okay. By our math -- which, you know,  
25 you can certainly say doesn't seem right to you --

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1 it seems like you spent about 32 hours meeting with  
2 counsel, at least as reflected in Exhibit Number 3.

3 Does that sound roughly accurate?

4 A. I'll take your word for it.

5 Q. Okay. In terms of Dr. Burnell's role  
6 in helping you as an expert in this case, are there  
7 any other ways in which she was involved in your  
8 work as an expert that are not reflected in Exhibit  
9 Number 3 in the invoices?

10 A. No. Kaitlyn Burnell's role was to  
11 assist me with compiling some of the data and  
12 literature. But beyond that, no.

13 Q. Was she involved at all in your written  
14 report?

15 A. She was not.

16 Q. Okay. Did she review a copy of your  
17 written report at any point?

18 A. I don't believe so.

19 Q. Okay. So, again, recognizing you have  
20 not done the math on this, by our math, these  
21 invoices reflect that you, in collaboration with  
22 Dr. Burnell and, it sounds like, a couple of folks  
23 in your lab, have billed approximately 331 hours  
24 for your work as an expert in this case.

25 Does that sound roughly correct?

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1 A. I'll take your word for it.

2 Q. Okay. And if we apply -- your billable  
3 rate is \$750?

4 A. Correct.

5 Q. Okay. I think -- again, subject to  
6 your correcting me on the math. I think, roughly,  
7 that's about 175, \$176,000. Does that sound right  
8 to you?

9 A. I have not done the math, but I'll take  
10 your word for it.

11 Q. Okay. Have you actually been paid for  
12 the amounts that you've invoiced up through  
13 June the 1st?

14 A. Well, I don't know if I've received the  
15 June --

16 Q. Yeah. But in advance of that?

17 A. Yes.

18 Q. Okay. So --

19 A. I don't know if I've received the May,  
20 sorry, because that was submitted in June.

21 Q. Okay. Got it. All right.

22 So it's -- but it sounds like since you  
23 were retained as an expert in 2023, you have  
24 been -- you have at least billed approximately  
25 \$175,000; is that right?

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1 MS. COUCH: Objection. Just to  
2 clarify, it will be for both JCCP and MDL.

3 MS. JONES: Well, I -- yeah. I wasn't  
4 differentiating. Let me ask the question again.

5 BY MS. JONES:

6 Q. Since you were retained by the lawyers  
7 for the plaintiffs in 2023, you have billed roughly  
8 \$175,000. Is that right?

9 A. I'll take your word for it.

10 Q. Okay. And I -- I take it that you have  
11 confidence that you will eventually be paid for the  
12 entirety of the amount that you have invoiced,  
13 correct?

14 A. I do.

15 Q. All right. And you have already told  
16 me that -- you're going to be deposed again. You  
17 know that, right? For the MDL?

18 A. I'm aware that that's probably  
19 happening.

20 Q. Yeah. And -- and you will bill for all  
21 that time, I assume, yes?

22 A. Yes.

23 Q. Do you know whether you're going to be  
24 involved in other parts of the litigation beyond  
25 the JCCP and the MDL?

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1 A. I'm not aware.

2 MS. COUCH: Objection.

3 BY MS. JONES:

4 Q. And then, if you eventually testify at  
5 a trial, you will bill for that time, right?

6 A. If that were to happen.

7 Q. Yes. And you'll bill for the time  
8 that's required to prep for such a trial, yes?

9 A. If that were to happen.

10 Q. Okay. And so if there's a trial by the  
11 beginning of 2026, there's a real possibility that  
12 by the time we get to the end of this year, 2025,  
13 you will have at least billed for as much as  
14 \$200,000?

15 MS. COUCH: Calls for speculation.

16 THE WITNESS: I can't determine how  
17 much will happen in the future.

18 BY MS. JONES:

19 Q. Well, I think you already told me that  
20 you've billed about \$175,000, yes?

21 MS. COUCH: Asked and answered.

22 THE WITNESS: I take your word for the  
23 amounts that you calculated.

24 BY MS. JONES:

25 Q. Sure. And by the time you're deposed

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1 again and potentially serve as a trial witness in  
2 one or two cases, I mean, if I saw you again a year  
3 from now, you might be into the  
4 quarter-of-a-million-dollars range. Possible?

5 MS. COUCH: Calls for speculation.

6 THE WITNESS: I imagine there will be  
7 more bills if there's more work. But I can't tell  
8 you how much.

9 BY MS. JONES:

10 Q. Okay. How many hours of the  
11 300-and-something hours that you've spent did you  
12 spend on preparing your written report?

13 MS. COUCH: Calls for speculation.

14 THE WITNESS: I can't tell you. I  
15 think that I indicate in here when I'm working when  
16 it is report work.

17 BY MS. JONES:

18 Q. Okay. So if we wanted to know that, we  
19 could rely on your invoices?

20 A. I think so.

21 Q. Do you know how many of your 330 or so  
22 hours you've spent on reviewing academic  
23 literature?

24 MS. COUCH: Calls for speculation.

25 THE WITNESS: I can't tell you. It was

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1 all compiled together as part of the report work.

2 BY MS. JONES:

3 Q. Okay. You have -- and we'll talk about  
4 this in a little bit more detail.

5 You have as part of your report  
6 so-called Exhibit B, which is a very, very, very,  
7 very, very long list of company -- what I will  
8 refer to as "company documents."

9 Do you know that?

10 A. "Company documents" meaning, like,  
11 the --

12 Q. Documents that --

13 A. Yes.

14 Q. -- have been produced by the  
15 defendants --

16 A. Yes.

17 Q. -- in this case. Okay.

18 A. Yes.

19 Q. Do you know -- and did you read -- do  
20 you know roughly how many pages those company  
21 documents comprise that are reflected in Exhibit B  
22 to your report?

23 A. Do I know how many pages? I can't --

24 Q. Yes.

25 A. I can't estimate how many pages.

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1 Q. Did you read every single one of the  
2 company documents that are reflected on Exhibit B?

3 A. I looked at, at least, every single  
4 document.

5 Q. What does "I looked at" mean?

6 A. I reviewed. I skimmed. I looked at.  
7 In some, I read in much more detail. In others, I  
8 read in less detail.

9 Q. Okay. And "skim" means what exactly?

10 MS. COUCH: Objection.

11 THE WITNESS: "Skim" means I looked  
12 through and read at least part of it.

13 BY MS. JONES:

14 Q. And how did you come to focus on those  
15 specific documents in Exhibit B?

16 A. In doing my own searches on the  
17 database, as well as asking counsel for documents  
18 that are related to the key outcomes of my  
19 interest. I looked for, searched and identified as  
20 many relevant documents as I could find. They  
21 started to be relatively repetitive. And once I  
22 saw those, I didn't need to compile more.

23 Q. What -- what -- when you say  
24 "the database," what database are you talking  
25 about?

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1 A. I don't know the name of it.

2 Q. Well, I'm trying to understand what was  
3 included in this database that you were searching.

4 A. Database of millions of documents.

5 Q. Okay. So you went into the database  
6 and ran searches; is that right?

7 A. Yes.

8 Q. Did you use specific terms?

9 A. I looked at broad themes, particularly  
10 related to brain development, fMRI, and things  
11 related to the brain as well as those related to  
12 problematic social media use, dopaminergic  
13 responses in the brain. I did some pretty -- I did  
14 many searches.

15 Q. And how did you come up with that  
16 specific set of search terms?

17 A. Those weren't my specific search terms  
18 per se but the themes that I was looking for.

19 Q. Do you have anywhere documented what  
20 specific search terms you used to go through the  
21 database?

22 A. No, I don't.

23 Q. And your testimony today is that you  
24 think that you looked at every single one of the  
25 documents that are reflected on Exhibit B?

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MS. COUCH: Objection. Misstates the testimony.

THE WITNESS: I said that I -- in terms of the documents considered, I have looked at and reviewed every single one of those documents.

BY MS. JONES:

Q. And so tell me -- tell me how your process worked. You went into the database. You ran searches. Did the database include documents for all of the defendants?

A. I believe so.

Q. Do you know?

A. I -- I do know, yes.

Q. So you -- you are confident that the --

A. I saw documents from all of the defendants.

Q. And do you have confidence that it was a comprehensive set of documents?

A. I do.

Q. Okay. Based on what?

A. Based on the sheer quantity of them, based on reviewing many of them across emails and across depositions, across other documents. It was very -- it was very thorough.

Q. Okay. So you went -- you went in and

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you ran search terms. And then how did you keep track of what documents you were going to include on Exhibit B?

A. How did I keep track of documents?

Q. Yeah. Eventually, what happened is you generated an Exhibit B to your report, right?

A. Uh-huh.

Q. Yes? You have to say "yes" or "no."

A. Yes. Yes. Sorry.

Q. And that Exhibit B includes a bunch of what's known -- what lawyers call "Bates numbers," yes? Identifying numbers, right? Do you need to look at Exhibit B --

A. I don't know --

Q. -- to remind yourself?

A. I don't know what you mean by "Bates numbers." Sorry.

Q. Well, that's just the term that lawyers use. It's just the identifying numbers --

A. Okay.

Q. -- of the documents.

Why don't you turn to Exhibit B, if that helps you.

A. Is it -- I don't --

Q. If they're both -- they should be

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roughly the same.

A. Okay. I'm not seeing Exhibit B right there. You mean this right here, B?

Q. No. I'm -- I'm -- yeah --

A. Yeah.

Q. -- so beginning of that exhibit --

A. Yeah. Yeah.

Q. -- you see that there are your -- there are specific identifying numbers --

A. Uh-huh.

Q. -- yes?

So my question is: How did you go through the process of memorializing -- you're in the database. How did you memorialize, okay, this is something I'm going to include in my Exhibit B? Did you keep a list -- a running list somewhere?

A. There's a folder of all the documents.

Q. So a folder that you created?

A. That I created with counsel.

Q. Okay. And then how was the list actually generated?

MS. COUCH: Objection.

I'm going to instruct you not to answer. That gets into attorney-client work on your report.

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BY MS. JONES:

Q. Were you -- were you personally involved in the creation of Exhibit B?

A. Yes.

Q. And did you go through and confirm that it was accurate with respect to the documents that you had reviewed?

A. I looked through --

Q. How -- how many hours did you spend reviewing the company documents that are featured at Exhibit B to your report?

MS. COUCH: Calls for speculation.

THE WITNESS: I can't tell you how many hours off the top of my head.

BY MS. JONES:

Q. Was it more or less than 20?

A. More than --

MS. COUCH: Calls for speculation.

THE WITNESS: -- 20. But I can't tell you how many exactly.

BY MS. JONES:

Q. Was it more or less than 50?

A. I cannot speculate --

Q. Okay.

A. -- the specifics.

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1 Q. Okay. You also list a number of  
2 deposition transcripts --  
3 A. Uh-huh.  
4 Q. -- in your -- associated with your  
5 report, yes?  
6 A. Uh-huh.  
7 Q. You have to say "yes" or "no" for  
8 the --  
9 A. Sorry.  
10 Q. -- court reporter.  
11 A. Yes.  
12 Q. That's okay.  
13 Do you know roughly how many deposition  
14 transcripts -- did you read those deposition  
15 transcripts in their entirety?  
16 A. Many of them I read in entirety. All  
17 of them I have looked through.  
18 Q. And when you say many of them you read  
19 in their entirety, how many did you read in their  
20 entirety?  
21 A. Handfuls of them I read thoroughly.  
22 Q. Who? Whose depositions do you think  
23 you read in their entirety?  
24 A. I am not good with names. I read  
25 Zuckerberg's in entirety.

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1 Q. Okay. Who else?  
2 A. I -- I'm horrible with names. There --  
3 I can -- we can go through them, if you want.  
4 Q. Well, why don't you flip to the -- that  
5 part of your --  
6 So in that same Exhibit B, Dr. Telzer,  
7 there is a part where it begins with a listing of  
8 people and then refers to deposition transcripts.  
9 And I wish I could give you a page, but  
10 there is no page associated with it. It just goes  
11 from documents to transcripts.  
12 It starts with Abby Tran, is the first  
13 person listed.  
14 A. I can see it on here, if -- if I can  
15 just rely on this.  
16 Q. Yes, you are welcome to rely on that.  
17 And Ryan can certainly scroll through for you.  
18 A. Uh-huh.  
19 Q. But I want to just ask you: Are there  
20 specific people, having a chance to see the names,  
21 who you say, "I remember reading that whole  
22 deposition transcript," other than Mark Zuckerberg?  
23 A. I read so many. I can't remember. And  
24 I'm bad with names. So I'm not sure.  
25 Q. So you don't know?

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1 Okay. And it refers here -- we'll come  
2 back to this in a moment. But it refers here to  
3 exhibits as well.  
4 A. Uh-huh.  
5 Q. You have to say "yes" or "no."  
6 A. Yes.  
7 Q. Are you -- did you review every exhibit  
8 associated with every one of the transcripts that  
9 you have listed in Exhibit B?  
10 A. I looked through the exhibits --  
11 Q. And does that mean --  
12 A. -- and I've read a lot of them in  
13 thorough.  
14 Q. When you say you read a lot of them,  
15 what does that mean?  
16 A. For some of the exhibits, I read them  
17 from cover to cover, so to speak. For others, I  
18 skimmed through.  
19 Q. And how did -- how did you make a  
20 judgment about the transcripts you were going to  
21 read versus those you were going to -- entirety, in  
22 their entirety, versus those you were just going to  
23 skim?  
24 MS. COUCH: Objection.  
25 I'm going to instruct you not to answer

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1 to the extent it calls for attorney-expert  
2 communications.  
3 BY MS. JONES:  
4 Q. Did you independently -- putting aside  
5 what the lawyers might have told you, did you  
6 independently form any judgments about which  
7 transcripts you really needed to read in their  
8 entirety?  
9 A. I independently went through them and  
10 opened them and saw some that were more relevant  
11 for my opinions and looked through those.  
12 Q. And what about for the deposition  
13 exhibits? How did you determine, putting aside  
14 what you talked about with the lawyers, which  
15 exhibits you were going to read from cover to cover  
16 and which ones you weren't?  
17 A. Similarly, I would go through and open  
18 them and look for the ones that appeared most  
19 relevant to the topics that I cover in my report.  
20 Q. Other than -- than, perhaps,  
21 Mr. Zuckerberg, were there -- were there any  
22 witnesses who were listed in Exhibit B who you know  
23 who they are or had some awareness of them?  
24 A. I couldn't tell you. I don't know.  
25 Q. But you didn't -- when you were

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1 generating this list, you didn't say, "Oh, I know  
2 [REDACTED]," right?

3 A. I don't think so.

4 Q. Okay. And is it correct to conclude  
5 that you have not had any interactions with any of  
6 these folks on this list? You have not spoken to  
7 any of them?

8 A. Not that I know of.

9 MS. COUCH: If you're done with that  
10 section, we've been going about an hour and a half.  
11 Can we take a five-minute break?

12 MS. JONES: Yes. I'm almost done with  
13 this.

14 BY MS. JONES:

15 Q. If that's okay with you, Dr. Telzer.

16 A. Sure.

17 Q. It'll be relatively painless.

18 So, all in, you have invoiced for 330  
19 or so hours of time up to June the 1st, right?

20 A. Uh-huh.

21 Q. Yes? You have to say "yes" or "no."

22 A. Yes.

23 Q. And within that 330 hours of time, your  
24 testimony is that you reviewed the transcripts, in  
25 part or in whole, of every person who is identified

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1 in Exhibit B?

2 A. Uh-huh. Yes.

3 Q. And that you reviewed the exhibits that  
4 are associated, either in part or in whole, with  
5 every single one of those depositions?

6 A. Yes.

7 Q. And you understand that that would  
8 entail reviewing tens of thousands, maybe closer to  
9 100,000, pages' worth of content, all in?

10 A. I opened and looked at those documents.

11 Q. Okay. And you did all of that within  
12 the span of 330 hours since 2023?

13 A. I did all of this work within the  
14 billed times in these statements.

15 Q. And when did -- when did you start  
16 actually reviewing deposition transcripts?

17 MS. COUCH: Calls for speculation.

18 THE WITNESS: I believe in November or  
19 December of '24.

20 BY MS. JONES:

21 Q. So between November of 2024 and today,  
22 June the 1st [sic], you have reviewed thousands and  
23 thousands of pages of company witness deposition  
24 testimony?

25 A. Yes.

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1 Q. Okay. And you have reviewed the  
2 related exhibits for all of those depositions?

3 A. Yes.

4 Q. In the last six months?

5 A. Yes.

6 Q. Has that impeded on your job  
7 responsibility?

8 MS. COUCH: Objection. Outside the  
9 scope.

10 MS. JONES: There is not a -- there is  
11 not a scope limitation.

12 BY MS. JONES:

13 Q. You can answer my question. Has that  
14 impeded on your job responsibilities as a professor  
15 at UNC that you have reviewed dozens and dozens and  
16 dozens of company witness deposition testimony and  
17 the related exhibits in the last six months?

18 MS. COUCH: Objection. Argumentative.

19 THE WITNESS: I have done this work  
20 outside of my UNC work hours.

21 BY MS. JONES:

22 Q. And just looking at your invoices --  
23 which you prepared, right?

24 A. Uh-huh.

25 Q. Yes?

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1 A. Yes.

2 Q. -- since November the 1st, you have  
3 only billed to these lawyers 65 hours. Did you  
4 know that?

5 A. I can't without looking at the details.  
6 Since November 1st, you're saying, what?

7 Q. That you have only billed to these  
8 lawyers 65 hours. Did you know that?

9 A. Sure.

10 Q. And so your sworn testimony today is  
11 that in the span of 65 hours, which also included  
12 meetings with lawyers, that you have reviewed the  
13 testimony of dozens of company witness employees  
14 and all of the related exhibits?

15 A. Yes.

16 Q. Which would be into the tens of  
17 thousands, and, potentially, 100,000, pages' worth  
18 of content. That's your testimony?

19 A. That's my testimony.

20 Q. Okay. And to the extent -- and you're  
21 not doing this during your day job, 9:00 to 5:00?

22 A. My day job is not 9:00 to 5:00.

23 Q. Mine isn't either, actually. What is  
24 your -- what are your work hours?

25 A. My work hours are relatively flexible.

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1 Q. Okay. So what part of the day are you  
2 spending on this -- or have you been spending on  
3 this work since November the 1st?

4 A. Different times of the day, evenings,  
5 weekends.

6 Q. Okay. So you've been spending your  
7 evenings and weekends reviewing all these company  
8 materials?

9 A. Some.

10 Q. All right. Let me finish this last  
11 little bit, and then we'll take a break.

12 You're -- you're currently -- are you  
13 currently an employee of the University of North  
14 Carolina? Is that that --

15 A. Yeah.

16 Q. -- the technical designation? Okay.

17 Did you have to seek approval from the  
18 university to serve as a paid expert for these  
19 lawyers?

20 A. I submitted to UNC that I'm doing  
21 out-of-UNC work, yes.

22 Q. And did you specifically disclose that  
23 you were serving as a -- a paid litigation expert?

24 A. Yes.

25 Q. Okay. Did the -- did that have to be

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1 approved by the university in this way -- in any  
2 way?

3 A. Yes.

4 Q. It did? Okay.

5 A. If I do out-of-university work, I  
6 disclose it and get it approved.

7 Q. In the course of the -- I guess it's  
8 roughly two years now that you have been a retained  
9 expert for plaintiffs' counsel, you have published  
10 on the issues that are the subject of this  
11 litigation, yes?

12 A. Yes. I've been publishing on the role  
13 of social media and adolescent mental health and  
14 brain development --

15 Q. Okay.

16 A. -- for years.

17 Q. And in each one of those circumstances,  
18 have you disclosed that you are a paid litigation  
19 expert for the plaintiffs in these cases?

20 A. At least once I was aware of my role,  
21 and that was about a year ago, I included very  
22 carefully, to the best of my ability, my conflicts  
23 of interest.

24 Q. And what about when you've made -- and  
25 you -- you also do kind of nonpublished just

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1 speaking things, as I understand it?

2 A. Uh-huh.

3 Q. Yes?

4 A. Yeah. All the time.

5 Q. Have you disclosed in those settings  
6 that you are a retained and paid expert working for  
7 the plaintiffs in this litigation?

8 A. Any time it's required to disclose  
9 conflicts of interest, I always do.

10 Q. Putting aside technical requirements of  
11 disclosure, do you think that it's important that  
12 you communicate with folks that you're sharing  
13 the -- your views with that you are, in fact, being  
14 paid by lawyers in a lawsuit involving these  
15 issues?

16 MS. COUCH: Objection. Argumentative.

17 THE WITNESS: I disclose it whenever it  
18 is relevant and required.

19 BY MS. JONES:

20 Q. Sure. And my question is: Putting  
21 aside what's required, do you think you should tell  
22 people simply in fairness to letting them know what  
23 financial interests you might have on these issues?

24 MS. COUCH: Asked and answered.

25 THE WITNESS: I disclose my conflicts

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1 of interest when required.

2 BY MS. JONES:

3 Q. Okay. But if it's not required, you  
4 don't disclose it; is that right?

5 A. I might. But I am very careful and  
6 thoughtful about doing it when it is required to  
7 ensure that I'm ethical in following those rules.  
8 When it's not required, I do sometimes.

9 Q. How do you decide -- when it's not  
10 required, how do you decide when you do or you  
11 don't?

12 MS. COUCH: Calls for speculation.

13 THE WITNESS: I can't tell you off the  
14 top of my head. I would need a specific example.  
15 But I always disclose in required circumstances.

16 BY MS. JONES:

17 Q. Okay. You -- do you consider yourself  
18 to have a financial interest in this litigation  
19 since you've been paid roughly \$175,000 since 2023?

20 A. I do not have a financial interest.

21 Q. Okay. Is there any amount of money  
22 where you would say you did have a financial  
23 interest?

24 MS. COUCH: Object to the form. Calls  
25 for speculation. Argumentative.

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1 THE WITNESS: I do not have a financial  
2 interest.

3 BY MS. JONES:

4 Q. Okay.

5 MS. JONES: Why don't we take a break.

6 THE VIDEOGRAPHER: Going off the  
7 record. The time is 10:49 a.m.

8 \* \* \*

9 (Whereupon, there was a recess in the  
10 proceedings from 10:49 a.m. to 11:11 a.m.)

11 \* \* \*

12 THE VIDEOGRAPHER: Going back on the  
13 record. The time is 11:11 a.m.

14 BY MS. JONES:

15 Q. Dr. Telzer, welcome back.

16 I want to correct one thing for the  
17 record. Earlier I had asked about the time you had  
18 spent, excluding the work of Dr. Burnell and  
19 interactions with attorneys, since November the 1st  
20 and said it was 65 hours.

21 We went back and looked at the invoice.  
22 It's actually 117 hours. For whatever that's  
23 worth, okay?

24 A. Okay.

25 Q. Okay. I assume that does not change

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1 anything in terms of your testimony. All right.

2 MS. JONES: Let me ask, Ryan, if we can  
3 pull up what we are going to mark as Exhibit Number  
4 4, Tab 85.

5 (TELZER EXHIBIT 4, Reliance list and  
6 materials considered list, was marked for  
7 identification.)

8 BY MS. JONES:

9 Q. And, Dr. Telzer, I will represent to  
10 you this is a copy of your reliance list and  
11 materials considered list that was provided to us  
12 by counsel yesterday evening.

13 So it's 900 pages, so we have not  
14 printed out the entire thing. I don't know if you  
15 have the updated version in this binder in front of  
16 you. Do you?

17 A. I believe so.

18 Q. Okay.

19 A. I'm not sure.

20 MS. COUCH: This is the -- this printed  
21 is the one from May 16th. And then we updated  
22 yesterday, and there are about 20 additional new  
23 items. And I'm working on -- I've asked my  
24 paralegal to put them into a list, but I have not  
25 received that yet.

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1 MS. JONES: Okay.

2 MS. COUCH: Because you guys emailed us  
3 and asked us to identify which ones, and so we are  
4 trying to do that. But I have not gotten --

5 MS. JONES: Well, that would be super  
6 helpful because this document went from, like,  
7 200 pages to 900 pages. Maybe we can talk about  
8 that --

9 MS. COUCH: Yeah.

10 MS. JONES: -- separately.

11 MS. COUCH: It went that way because we  
12 listed out or my paralegal listed out every  
13 single --

14 MS. JONES: -- exhibit.

15 MS. COUCH: -- exhibit. So it was like  
16 Mark Zuckerberg 1, Mark Zuckerberg 2. And so --

17 MS. JONES: Okay. Let me ask her  
18 questions. I don't want to use time on this.

19 MS. COUCH: Yeah.

20 MS. JONES: But we can talk about that  
21 on a break.

22 MS. COUCH: Yeah.

23 BY MS. JONES:

24 Q. Okay. Have you seen what we have up in  
25 front of you, what we've marked as Exhibit Number

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1 4, which is the updated list of reliance and  
2 materials considered that were provided to us by  
3 your counsel yesterday, June the 12th?

4 A. Yes.

5 Q. Did you have a chance to go through  
6 that entire document?

7 A. I've gone through all of the things in  
8 here, yes.

9 Q. Okay. And subject to what sounds like  
10 will be some further discussions with counsel about  
11 what's been included in the list, do you have an  
12 understanding of what was included between what we  
13 got in April of this year and this that we received  
14 yesterday?

15 A. Generally speaking.

16 Q. Okay. What is your understanding of  
17 what got included on Exhibit Number 4?

18 A. All the additional documents that I  
19 have reviewed since.

20 Q. And did you have an understanding that  
21 your original list was, I think, roughly 230 pages  
22 and it's now roughly 930 pages? Did you know that?

23 A. I don't know the numbers.

24 Q. Okay. But to the extent that there is  
25 a delta, the delta represents additional things

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1 that you've reviewed since April?

2 A. No, that's not the case. As indicated  
3 in the documents, it was listed differently in the  
4 two documents.

5 Q. Okay. Are -- are you testifying today  
6 that -- with respect to what was provided to us  
7 yesterday, Exhibit Number 4, that you have  
8 reviewed everything that appears on that  
9 several-hundred-page supplemental reliance list?

10 MS. COUCH: Asked and answered.

11 THE WITNESS: I have reviewed all the  
12 documents in my --

13 BY MS. JONES:

14 Q. Yeah. And just to --

15 A. -- list.

16 Q. -- to respond to counsel's objection,  
17 we were earlier discussing your list from April of  
18 this year. So I'm now asking you about what we  
19 received yesterday, which is several hundred pages  
20 longer.

21 Are you comfortable that anything  
22 that's on there you have reviewed --

23 A. I've --

24 Q. -- all of it?

25 A. Sorry. I've reviewed everything on the

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1 list.

2 Q. Okay.

3 MS. COUCH: Misstates her testimony.

4 BY MS. JONES:

5 Q. One thing that's on your new list --

6 MS. JONES: I think this is on

7 Page 710, if we want to take Dr. Telzer to that on  
8 the screen. 710. I think that's the Bates number.  
9 Sorry.

10 BY MS. JONES:

11 Q. One of the things that you included,  
12 Dr. Telzer -- you'll see it as we pull it up on the  
13 screen -- are expert reports.

14 A. Yes.

15 Q. And those are expert reports from --  
16 there are a number of folks listed here.

17 A. Uh-huh.

18 Q. What do you understand those to be?

19 MS. COUCH: Objection. Vague.

20 THE WITNESS: Expert reports.

21 BY MS. JONES:

22 Q. And you have listed here over 65 expert  
23 reports. Did you know that?

24 A. I've listed here the reports that I've  
25 reviewed.

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1 Q. And did you review all of the expert  
2 reports that are reflected at -- I believe this is  
3 the Bates number -- 709 to 715 of Exhibit 4?

4 A. I've reviewed all the documents on my  
5 list.

6 Q. Including all those expert reports?

7 A. I've reviewed these expert reports.

8 Q. And you understand that those reports  
9 amount to several hundred pages?

10 A. Sure.

11 Q. And you've read all that since  
12 April when you submitted your first report?

13 MS. COUCH: Objection. Misstates her  
14 testimony.

15 THE WITNESS: I've reviewed all these  
16 documents.

17 BY MS. JONES:

18 Q. Well, my question -- I want to be --  
19 just want to be very specific about this.

20 Since April, when you signed your  
21 initial JCCP report, Exhibit Number 2, have you  
22 reviewed the entirety of the expert reports that  
23 are reflected in Exhibit Number 4?

24 A. I have reviewed all of these expert  
25 reports.

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1 Q. In their entirety?

2 A. I've at least looked at, if not read,  
3 many of them in their entirety.

4 Q. I want to make sure I understand that.  
5 When you say "looked at, if not read, in their  
6 entirety," what does that mean?

7 A. Either skimmed through or read every  
8 word of.

9 Q. Okay. And skimming through does not  
10 mean reading it in its entirety, just to be fair?

11 A. It means looking over it.

12 Q. Okay. Which means you did not read the  
13 entire report in some instances?

14 A. In some instances, I did not read every  
15 word.

16 Q. How did you decide which reports -- and  
17 I don't want -- we've now heard this many times. I  
18 don't want to hear about what you talked about with  
19 the lawyers.

20 In terms of any independent judgment  
21 that you exercised, how did you decide what reports  
22 you were going to review in their entirety?

23 A. I opened and looked for the ones most  
24 relevant to my opinions and the outcomes of  
25 interest that I was studying.

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Q. Let me ask you about just a small number of things that appear on this supplemental list that we received.

MS. JONES: Can we go to 705, which I believe is the Bates.

BY MS. JONES:

Q. And there's a specific reference on 705 to a [REDACTED] LinkedIn. Do you see that?

A. Uh-huh.

Q. You have to say "yes" or "no."

A. Yes.

Q. Who is [REDACTED]?

A. [REDACTED] is, to my understanding, an employee of Meta and somebody who published literature that I've reviewed.

Q. What do you mean to your understanding?

A. Based on the LinkedIn profile.

Q. And let's go to 703. That's the Bates number. Was there a reason you were citing Ms. [REDACTED]'s LinkedIn page?

A. I reference in my report [REDACTED] research and indicate, to my understanding, that she works for Meta and cite to her LinkedIn.

Q. What specific research do you believe

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someone named [REDACTED] did for Meta?

A. [REDACTED] published many articles related to adolescent social media use and brain development.

Q. And why were you citing her LinkedIn page?

A. Because I indicate --

MS. COUCH: Asked and answered.

THE WITNESS: Because I indicate in my report that this is important research that I cite and just -- to my understanding, she works for Meta, and I show on her LinkedIn profile.

BY MS. JONES:

Q. Let's go to 703. There's a reference to "Drug Misuse and Addiction." It's got "(n.d.)" in the left-hand column. Do you see that?

A. Yeah.

Q. What is that?

A. I'd have to go through my report to find that.

Q. Now, you've -- you've testified that you read everything on this list, yes?

A. Yes.

Q. Okay. You couldn't tell me today what this is, though?

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A. I would have to go through my report to see where I cite that.

Q. Okay. Let's go to 702. And there is a reference to "7 facts about Americans and Instagram" from October 7, 2021. Do you see that?

A. Uh-huh.

Q. You have to say "yes" or "no."

A. Yes.

Q. What is that?

A. I don't recall every single document in its entirety, but I have looked and reviewed all of these.

Q. Well, understood. But do you have any recollection of what that is or why you cited it on your materials considered list?

MS. COUCH: Asked and answered.

THE WITNESS: I would have to go back and look through, but I reviewed everything on this document.

BY MS. JONES:

Q. Okay. Let me take you to six -- this is Bates Number 704. And there's an article described as "His Job Was to Make IG Safe for Teens." Do you see that?

A. I see that.

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Q. Who does that article refer to; do you know?

A. I don't recall off the top of my head.

Q. You don't know?

A. I don't recall off the top of my head what that specifically refers to. I've reviewed everything on this document list.

Q. What -- let me take you to 705. And there's a reference to a LinkedIn by someone named Miki Rothschild down at the bottom of the page. Who is Miki Rothschild?

A. I don't recall off the top of my head.

Q. Why were you referring to Miki

Rothschild's LinkedIn?

A. I don't recall.

Q. Immediately below that, there's a reference to "Miki Rothschild Third Amended Deposition Cross-Notice for 11/21/2024." Do you see that?

A. Yes.

Q. And you still don't know who Mr. Rothschild is, right?

A. I don't recall.

MS. COUCH: Asked and answered.

BY MS. JONES:

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1 Q. Do you know why you were referring in  
2 your materials considered list to a Third Amended  
3 Deposition Cross-Notice for 11/21/2024?  
4 A. I don't recall off the top of my head,  
5 but I reviewed all of these documents.  
6 Q. Do you -- do you know what an amended  
7 deposition cross-notice is?  
8 A. Not off the top of my head.  
9 Q. Would it be relevant to your academic  
10 work to know about something like that?  
11 A. I would have to go back and look at it.  
12 Q. Let me ask you to go to 716, which is  
13 that listing of deposition transcripts that you  
14 said you testified -- you reviewed.  
15 Up at the top, there's a reference to  
16 an employee named Abby Tran. Do you see that? Do  
17 you see that?  
18 A. Yes.  
19 Q. Who is Abby Tran?  
20 A. I don't recall off the top of my head.  
21 Q. What is Abby Tran's role at Snap?  
22 MS. COUCH: Calls for speculation.  
23 THE WITNESS: I don't recall.  
24 BY MS. JONES:  
25 Q. You don't know?

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1 A. I don't recall.  
2 Q. Why was her testimony relevant to your  
3 opinions?  
4 A. I don't recall.  
5 Q. Okay. If I asked you that question as  
6 to any person listed here in your deposition  
7 listing -- Do you know them and do you know why  
8 their testimony was relevant? -- could you answer  
9 that question? Other than Mark Zuckerberg.  
10 MS. COUCH: Compound. Calls for  
11 speculation.  
12 MS. JONES: Well, that -- that's a  
13 fair -- that's a fair objection.  
14 BY MS. JONES:  
15 Q. For any person on this list other than  
16 Mark Zuckerberg, is there any one of them where you  
17 could tell me, "I know that person's role at the  
18 company"?  
19 A. Not off the top of my head. But I  
20 looked through all of these documents and deemed  
21 them relevant and important and looked through  
22 them.  
23 Q. Okay. But you couldn't tell me  
24 today -- could you tell me for any one of these  
25 people other than Mark Zuckerberg why you thought

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1 their testimony was relevant?  
2 A. In looking through their -- in looking  
3 through the documents, I saw relevant topics being  
4 discussed and looked at them further based on that.  
5 Q. Are -- do you know whether these  
6 deposition transcripts represent all of the  
7 deposition testimony that was taken of the  
8 defendants in these cases?  
9 MS. COUCH: Calls for speculation.  
10 THE WITNESS: I couldn't tell you.  
11 BY MS. JONES:  
12 Q. Is it possible that there are  
13 depositions that you did not cite in your list of  
14 materials considered?  
15 MS. COUCH: Calls for speculation.  
16 THE WITNESS: I couldn't tell you.  
17 BY MS. JONES:  
18 Q. Are you certain that you have reviewed  
19 all of the relevant company deposition testimony --  
20 MS. COUCH: Vague. Calls for  
21 speculation.  
22 BY MS. JONES:  
23 Q. -- as part of developing your opinions  
24 in this case?  
25 MS. COUCH: Same objection.

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1 THE WITNESS: I looked for as many  
2 relevant ones as I could. I didn't necessarily  
3 need all of them to reach these conclusions.  
4 BY MS. JONES:  
5 Q. As part of your academic research, do  
6 you ever rely on deposition testimony from -- I  
7 guess the question would be: anybody?  
8 MS. COUCH: Objection. Vague.  
9 THE WITNESS: I, to my understanding,  
10 have never had access to something like this before  
11 to be able to use it in my academic setting.  
12 BY MS. JONES:  
13 Q. Yeah, that was -- that's an answer to a  
14 different question.  
15 My question is: Do you ever as part of  
16 your academic research rely on company witness  
17 testimony?  
18 A. To my understanding, I do not have  
19 access to this type of information. So I've never  
20 had the opportunity to use it to rely on anything  
21 for my academic work.  
22 Q. Dr. Telzer, for a number of these  
23 hundreds of -- I mean, we can agree that you have  
24 hundreds of company documents listed in Exhibit B  
25 to your report. Is that right?

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1 A. Sure.

2 Q. Okay. And you have listed, let's say,  
3 dozens of transcripts of company witnesses, yes?

4 A. Sure.

5 Q. And for the vast majority of those  
6 company documents, you do not specifically cite  
7 them in connection with your report. Is that fair  
8 to say?

9 A. Sure.

10 Q. And same thing with respect to the  
11 deposition testimony. For the vast majority of the  
12 deposition testimony, you do not explicitly cite it  
13 in connection with any of the opinions that you  
14 articulate in your report, right?

15 A. Correct.

16 Q. Okay. And, in fact, you only cite a --  
17 a significant minority of the company documents  
18 that are listed at Exhibit B to your report, right?

19 A. There may be a minority that are  
20 explicitly cited to in my report. I don't  
21 necessarily rely on those to form my opinions.

22 My opinions were largely based on the  
23 literature and my education and my discussions with  
24 families and teens to come to these opinions.

25 The depositions and other material

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1 complemented my opinions but did not necessarily  
2 form my opinions.

3 Q. When you say you didn't necessarily  
4 rely on the company documents and deposition  
5 testimony to form your opinions, you said  
6 "necessarily." Did you rely on that information at  
7 all to form your opinions?

8 A. I looked through all of these. They  
9 were all very informative. They complemented what  
10 I had learned from the science. My opinions remain  
11 my opinions without those documents, but those  
12 supported all of my opinions.

13 Q. You -- you -- in terms of the  
14 literature that you cited in your reliance list --

15 MS. COUCH: Objection. Misstates the  
16 title of the list.

17 MS. JONES: Okay.

18 BY MS. JONES:

19 Q. Well, you've cited in connection with  
20 your report a number of pieces of literature,  
21 correct?

22 A. Correct.

23 Q. And for a significant portion of the  
24 literature that you cite, many of those articles  
25 include limitations of the research, yes?

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1 MS. COUCH: Objection. Broad.

2 THE WITNESS: If you identify specific  
3 articles, I can certainly answer that more  
4 explicitly. But, generally speaking, our published  
5 articles include limitation sections.

6 BY MS. JONES:

7 Q. Okay. And you -- you acknowledge the  
8 limitations that have been articulated by the  
9 authors of those studies, yes?

10 MS. COUCH: Objection. Broad.

11 THE WITNESS: Yeah. That's too general  
12 to answer.

13 BY MS. JONES:

14 Q. Well, let me ask it a slightly  
15 different way.

16 To the extent that you've cited a -- a  
17 piece of literature by other academics and experts  
18 in the field and those folks identified limits to  
19 whatever their findings were -- are you with me?

20 A. I'm with you.

21 Q. -- do you accept the limitations that  
22 they articulated with respect to their own research  
23 and findings?

24 MS. COUCH: Objection. Vague. Calls  
25 for speculation.

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1 THE WITNESS: I would need a specific  
2 example to be able to answer that.

3 BY MS. JONES:

4 Q. Well, do you -- can you think of a --  
5 let me ask in general. You read a lot of papers  
6 of -- published papers as part of your work, yes?

7 A. Yes.

8 Q. Including papers that are published as  
9 part of the peer-reviewed literature, yes?

10 A. Yes.

11 Q. And it is quite common -- maybe it  
12 always happens -- that when research is published,  
13 there is a section at the end where the authors  
14 will acknowledge potential limitations in their  
15 research and the findings, yes?

16 A. There are limitations sections in most  
17 empirically published articles.

18 Q. Yes. And, in fact, in your own  
19 publications -- we'll look at this later -- you  
20 include information on the limits of the  
21 conclusions that you reach, right?

22 A. There are limitations sections in  
23 empirical papers.

24 Q. Including yours, yes?

25 A. Including mine.

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Q. Okay. And my question is: You are not going to come to court and say those authors were wrong about the limitations that they expressed with respect to their own data and findings, right?

MS. COUCH: Objection. Calls for speculation. She also doesn't know what she'll be asked to testify to at court.

THE WITNESS: I can't tell you about that.

BY MS. JONES:

Q. Well, would you generally do that when you -- when you read the work of some other researcher or academic? Do you look at their limitations and say, "I think they're wrong about their limitations"?

MS. COUCH: Objection. Vague. Broad. Asked and answered.

THE WITNESS: When I look at empirical papers, I usually rely on the methods section and the results section to come to my own conclusions about the strengths of their research.

BY MS. JONES:

Q. Do you usually review the limitations section?

A. I will review the limitations section,

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yes.

Q. Do you usually review the conflict of interest section when you review papers?

A. I may or may not.

Q. Is the information that's included in the conflict of interest section, is that useful for you to be aware of?

MS. COUCH: Objection. Vague.

THE WITNESS: I'm not sure.

BY MS. JONES:

Q. There are circumstances where you would not want to know if an author on a paper had a conflict of interest?

MS. COUCH: Objection. Vague. Calls for speculation.

THE WITNESS: I'm not sure.

BY MS. JONES:

Q. As part of your opinions in the case, you have relied on data that you yourself collected as part of your research, right?

A. As one part of my report, I include my own data.

Q. Yeah, understood. And in your research, you have collected data on social media use at three points in time: 2020, 2021 and 2023.

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Is that right?

A. We have a large longitudinal study that spans now six years of data collection.

Q. Yeah. My question is: Did you collect the data in 2020, 2021 and 2023?

MS. COUCH: Objection. Vague.

THE WITNESS: I have to look back. There are more dates than that. There's data collected across many years of data, or many -- yeah. There's data collected across many years.

BY MS. JONES:

Q. Okay. Are there other points in time that you can recall collecting objective social media use data?

MS. COUCH: Objection. Vague.

THE WITNESS: We have been collecting objective social media use data for the past five years or more.

BY MS. JONES:

Q. Okay. And have -- are there instances of collection that you are thinking of other than 2020, 2021 and 2023?

MS. COUCH: Objection. Vague.

THE WITNESS: I'd have to look back at the specific datasets.

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BY MS. JONES:

Q. You don't know, sitting here today?

MS. COUCH: Objection. Vague.

THE WITNESS: There are other datasets beyond those years.

BY MS. JONES:

Q. Well, I understand there are other datasets. My question was specifically about the collection of objective social media use data and whether there were collections other than in 2020, 2021 and 2023.

Is your testimony that there may have been other collections of such data and you just don't remember it?

A. We --

MS. COUCH: Objection. Vague.

THE WITNESS: We continue to collect those data in 2024, 20 -- 2025 and into the future.

BY MS. JONES:

Q. Are you relying on data that you say you've collected in 2024 and 2025 in connection with your opinions in this case?

MS. COUCH: Objection. Calls for a legal response.

THE WITNESS: Am I relying on data

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1 collected in 2024 and 2025? Is that what you  
2 asked?

3 BY MS. JONES:

4 Q. That is what I asked.

5 MS. COUCH: Same objection.

6 BY MS. JONES:

7 Q. Well, let me -- let me be clear about  
8 my question. In connection with the opinions that  
9 you're offering in this case, are you relying on  
10 data that was collected in 2024 or 2025?

11 A. My --

12 MS. COUCH: Objection.

13 THE WITNESS: My opinions are based on  
14 a totality of all the research I have done as well  
15 as data collected and reported in the report.

16 BY MS. JONES:

17 Q. And so I'm not sure if that's a "yes"  
18 or a "no" to my question. You have testified that  
19 you think -- that you have also collected data in  
20 2024 and 2025. Did I hear that correctly?

21 A. We have been collecting data for years,  
22 including 2024 and 2025.

23 Q. Now, focus on my question. Are you  
24 relying on data you collected in 2024 and 2025 for  
25 purposes of your opinions in this case?

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1 MS. COUCH: Objection. Argumentative.  
2 Vague. The basis of what she is relying upon is  
3 listed in her report.

4 THE WITNESS: I'm relying upon the  
5 totality of everything reviewed in my report,  
6 including my education, experience, talking to  
7 parents, talking with teachers, the research that I  
8 have done, the literature that I have reviewed to  
9 come to my opinions.

10 BY MS. JONES:

11 Q. So -- so you can't give me a "yes" or a  
12 "no" on 2024 and 2025. What about 2023?

13 MS. COUCH: Asked and answered.

14 BY MS. JONES:

15 Q. Are you -- are you relying on objective  
16 social media use data that you collected in 2023 as  
17 part of your opinions in this case?

18 MS. COUCH: Asked and answered. Vague.  
19 Calls for a legal response basis in the report.

20 THE WITNESS: My opinions are based on  
21 the totality of everything included in my report.

22 BY MS. JONES:

23 Q. Okay. So you can't give me a "yes" or  
24 "no" on that one --

25 MS. COUCH: Asked and answered.

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1 BY MS. JONES:

2 Q. -- either.

3 Have you published on the 2025 data  
4 that you've testified you collected?

5 A. The 2025 data are ongoing data  
6 collection.

7 Q. Okay. For some of the data we've been  
8 discussing, you collected data on total screen  
9 time, notifications and pickups and app-specific  
10 data; is that right?

11 A. That's correct.

12 Q. Are you relying on that data in forming  
13 your opinions in this case?

14 MS. COUCH: Objection. Calls for a  
15 legal response.

16 THE WITNESS: I'm relying on the  
17 totality of the research and everything included in  
18 my report to reach my opinions.

19 BY MS. JONES:

20 Q. Okay. So you can't answer that  
21 question for me yes or no?

22 MS. COUCH: Asked and answered.  
23 Argumentative.

24 THE WITNESS: I'm relying on everything  
25 in my report.

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1 BY MS. JONES:

2 Q. Okay. So I'll put that down as a  
3 "can't answer yes or no."

4 (TELZER EXHIBIT 5, Excel printout  
5 titled Smartphone Data, was marked for  
6 identification.)

7 BY MS. JONES:

8 Q. Let me hand you what we'll mark as  
9 Exhibit Number 5.

10 MS. COUCH: Asked and answered.

11 MS. JONES: And we're also going to  
12 mark Exhibit Number 6.

13 (TELZER EXHIBIT 6, Screen time school  
14 data, was marked for identification.)

15 BY MS. JONES:

16 Q. This is 5.

17 MS. JONES: Are we able to put Tab 4 up  
18 on the screen?

19 MS. ANTOINE: Yeah.

20 BY MS. JONES:

21 Q. Okay. Dr. Telzer, you have in front of  
22 you as Exhibit Number 5 what was produced to us in  
23 an Excel file of -- that was entitled "Smartphone  
24 Data." Do you recognize that data?

25 A. Yes.

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Q. Okay. And then what we also will have on the screen is what was produced -- that's Exhibit Number 5. And then Exhibit Number 6 is what was produced to us as -- also as an Excel MDL 2, which we will put up in a moment.

MS. COUCH: So this one's Exhibit 5, and they are about to show you a separate exhibit they're going to talk about, too.

BY MS. JONES:

Q. Yeah, Exhibit 5 is the one in front of you. So we're putting the other one on the screen just because it's --

Okay. So what we have up on the screen and we have a placeholder for exhibit purposes is Exhibit Number 6, which was produced to us by your lawyers as MDL 2. Do you recognize Exhibit Number 6?

A. Yeah.

Q. And these data, Exhibit Number 5 and Exhibit Number 6, include data on total smartphone screen time, pickups and notifications that you collected, I believe, in 2021; is that right?

A. Yep.

Q. And neither Exhibit Number 5 nor Exhibit Number 6 report data on individual platform

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use; is that right?

A. That's correct.

Q. Did you collect that data?

A. We collected the top apps that they were using. Our preliminary data includes the specific social media data.

Q. Do you know whether the data on specific apps was produced in this case?

MS. COUCH: Object to the form.

THE WITNESS: Yes. We shared all -- all of the data that we had.

BY MS. JONES:

Q. Including the 2021 data on specific platforms?

A. That's included.

MS. COUCH: Objection. Vague.

BY MS. JONES:

Q. You think you produced that?

A. The -- can you say what you mean by "specific platforms"?

Q. I mean the data that actually looks at what you gathered broken out by the specific social media platforms --

A. Sorry. We don't have -- let me --

Q. For 2021.

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A. I need a minute to look through my report.

Q. Okay.

A. I'm trying to recall if we have it by specific platform.

Q. Dr. Telzer, you're obviously welcome to look at whatever you want to, but if you look at Page 121 of your report --

A. Yeah, that's where I am. Although, 1 -- I think 122. Sorry. That might be --

Q. Yes, it carries over.

A. Yeah.

Q. Yeah, the section starts on 121.

A. Yes, I shared those data.

Q. Well, I want to be sure we're clear about -- you discussed the data in your report, right?

A. Yes.

Q. The -- the app-specific data for 2021, correct?

A. Yes. Correct.

Q. Do -- do you know whether that data was provided to defense counsel in connection with your production --

A. Yes.

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Q. -- in this case?

A. Yes, those data were provided.

Q. Okay. And to the extent that we don't have it, it sounds like you have no objection to it being provided to counsel?

A. I have provided those data.

Q. Well, that's not my question. If -- if we don't have it, it sounds like you have no problem with us receiving it; is that right?

MS. COUCH: Objection. That would call for something involving a legal response. If you have a specific request, specific, send it and we'll respond.

MS. JONES: Well, we -- we've made all kinds of requests. I just want to make sure that I understand, with respect to Dr. Telzer, you don't have an objection to the production of the specific app data from 2021, which is described at Pages 121 to 122 of your report.

MS. COUCH: That calls for a legal objection [sic]. She's not able to make it. To the extent that there is a specific request, we will work with her. And if we can provide it, we will. But we -- she cannot answer that question.

BY MS. JONES:

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1 Q. I'm not asking you as a lawyer. I'm  
2 asking you, as the person who collected the data  
3 and has written about the data, does it give you  
4 any concern that we would have access to that data?

5 A. I've shared those.

6 MS. COUCH: Objection.

7 THE WITNESS: Sorry.

8 BY MS. JONES:

9 Q. You think you've shared the data; is  
10 that your testimony?

11 A. I've shared the data.

12 Q. Okay. And when you say you've shared  
13 the data, do you believe that the data has been  
14 made available to your lawyer so they could give it  
15 to us?

16 A. Correct.

17 Q. Okay. Do you know one way or the other  
18 whether it was actually produced to us?

19 A. I don't know what was produced to you.

20 (TELZER EXHIBIT 7, Date showing total  
21 screen time and total social media screen time, was  
22 marked for identification.)

23 BY MS. JONES:

24 Q. Okay. Dr. Telzer, I'm handing you what  
25 we've marked as Exhibit Number 7. And this is --

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1 Dr. Telzer, you have in front of you a hard copy of  
2 a spreadsheet that was produced to us. I believe  
3 the file name was MDL 1. We also have it up on the  
4 screen.

5 A. Uh-huh.

6 Q. Do you recognize that data?

7 A. Yeah.

8 Q. And that data shows total screen time  
9 and total social media screen time, correct?

10 A. Yes.

11 Q. And that data was collected, and you're  
12 welcome to flip through the hard copy, in 2023 and  
13 2024?

14 A. Yes.

15 Q. In connection with that data, did  
16 you -- strike that.

17 In connection with this particular  
18 dataset, did you collect any data on notifications?

19 A. I don't recall.

20 Q. You don't know one way or the other?

21 A. I don't recall.

22 Q. Do you know whether you collected any  
23 data on pickups?

24 A. I don't recall.

25 Q. Do you know whether you collected any

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1 data as part of this dataset on individual apps,  
2 whether social media or some other kind of app?

3 A. I don't recall.

4 Q. And I take it that if you don't recall  
5 whether you collected it or not, you're not --  
6 you're not recalling having produced any of that to  
7 your lawyers. Is that fair?

8 A. I'm confused by the question. I'm  
9 sorry.

10 Q. Well, and my question is, perhaps, just  
11 kind of inferring from your answer.

12 You say you don't recall whether you  
13 collected data on notifications, pickups or  
14 individual applications as part of this dataset in  
15 Exhibit Number 7, right?

16 A. Correct.

17 Q. And I would assume by implication you  
18 have no recollection of having given that data on  
19 those particular items to counsel that you're  
20 working with?

21 A. I gave counsel all -- all the data that  
22 is included in here.

23 Q. Okay. And when you say "in here," you  
24 mean your report?

25 A. In my report.

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1 Q. All right. Do you know to what extent  
2 all that data was then transmitted to defense  
3 counsel?

4 MS. COUCH: Asked and answered.

5 BY MS. JONES:

6 Q. It's okay if you don't. I'm just  
7 asking.

8 A. I don't know, no.

9 Q. Okay.

10 A. I mean, this is all of the data right  
11 here.

12 Q. You mean Exhibit 7?

13 A. Exhibit 7 is the data from the  
14 2023-2024 that I shared.

15 Q. Yes. Right. Okay.

16 And I guess, just -- just so I  
17 understand, does that mean you don't believe that  
18 you collected data on notifications, pickups or  
19 specific apps?

20 A. I don't recall what other data we have.

21 (TELZER EXHIBIT 8, Haag cleaned  
22 dataset, was marked for identification.)

23 BY MS. JONES:

24 Q. Okay. So, Dr. Telzer, what you will  
25 see on the screen is what we will mark for purposes

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1 of the record as Exhibit Number 8. This was  
2 produced to us, I believe, a couple of days ago by  
3 your counsel.

4 Do you recognize Exhibit Number 8?

5 A. I think so. Can you scroll to the top,  
6 please?

7 Q. Yeah.

8 MS. JONES: Could you scroll to the  
9 top, please?

10 THE WITNESS: I can now see. Yeah.

11 BY MS. JONES:

12 Q. Okay. And these are data on smartphone  
13 use, including by app, from 2020; is that right?

14 A. Yes.

15 Q. And is what's reflected in  
16 Exhibit Number 8 the entirety of the data on  
17 objective smartphone use that you collected in  
18 2020?

19 MS. COUCH: Object to the form. Vague.

20 THE WITNESS: This is all of the data  
21 that was represented in the Haag paper that I cite  
22 to in my report.

23 BY MS. JONES:

24 Q. Okay. But I just want to make sure  
25 I'm -- we're clear on the record. Was there any

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1 other data that was collected on objective  
2 smartphone use in 2020?

3 MS. COUCH: Objection. Vague.

4 THE WITNESS: I couldn't tell you off  
5 the top of my head.

6 BY MS. JONES:

7 Q. This is all you're recalling right now?  
8 Which is fine. I'm just asking.

9 A. Yep. This is the data that were in the  
10 Haag paper, which is what I shared.

11 Q. Okay.

12 A. The specific data from that paper.

13 Q. Dr. Telzer, are you familiar with the  
14 names of --

15 MS. JONES: We can take that down.

16 Thank you.

17 BY MS. JONES:

18 Q. Are you familiar with the names of any  
19 of the specific individual plaintiffs in this  
20 litigation?

21 A. The specific names? What do you mean  
22 by the "specific names"?

23 Q. Well, do you understand who the  
24 plaintiffs are in this litigation?

25 A. Who the plaintiffs are? The individual

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1 people?

2 Q. Yes.

3 A. I may generally know from reading  
4 the -- the -- I don't even know what they're  
5 called. Sorry.

6 Q. The -- like, the -- the complaints or  
7 the pleadings?

8 A. Yes.

9 Q. Yeah. Okay. That -- that's fine.

10 My -- my question was really just: You  
11 have an understanding that there are individual  
12 either teenagers or their families who have brought  
13 lawsuits against the defendants in the litigation?

14 A. Uh-huh.

15 Q. Do you have an understanding of that?

16 A. I have an understanding of that.

17 Q. Okay. And you also understand that  
18 there are school districts who -- that have brought  
19 claims against the defendants as well?

20 A. Generally speaking.

21 Q. Generally speaking. And I'm -- I'm  
22 going to conclude from your reference to "generally  
23 speaking" that you don't -- it would be fine if you  
24 don't.

25 But you don't know the names of any

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1 specific individual teenager or families who are  
2 bringing claims in these cases; is that right?

3 A. I can't tell you the names.

4 Q. Okay. That's fine. And you don't,  
5 similarly, know the names of any specific school  
6 district that's brought claims in the litigation;  
7 is that right?

8 A. I can't tell you the names off the top  
9 of my head.

10 Q. Okay. Did you -- and this may just  
11 kind of naturally follow from your earlier  
12 testimony.

13 But did you review medical records for  
14 any of the individual plaintiffs who've brought  
15 claims in these cases?

16 A. No, I have not reviewed medical records  
17 of the plaintiffs.

18 Q. Okay. And you're not offering opinions  
19 on whether any individual plaintiff in the  
20 litigation experienced some kind of change in brain  
21 development as a result of using social media,  
22 correct?

23 A. I don't necessarily diagnose an  
24 individual. I conduct research that tells us very  
25 broadly about some of these connections between

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1 social media use and brain development that we then  
2 use to understand these processes in the  
3 population.

4 Q. I totally understand. And my question  
5 is really more -- a little more specific.

6 You are not coming into any individual  
7 case and saying, "I know for plaintiff A, B or C  
8 that that specific plaintiff experienced brain  
9 changes as a result of using social media,"  
10 correct?

11 MS. COUCH: Vague. Asked and answered.

12 THE WITNESS: I --

13 BY MS. JONES:

14 Q. And let -- let me be a little more  
15 clear, just to be fair to you.

16 I understand that you have a general  
17 opinion about brain changes as a result of social  
18 media, yes?

19 A. Sorry. Say that again.

20 Q. I understand that you have a general  
21 opinion about brain changes resulting in teenagers  
22 and adolescents as a result of using social media,  
23 generally speaking, right?

24 MS. COUCH: Vague. Calls for legal  
25 reasoning.

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1 THE WITNESS: I have a very strong  
2 opinion that social media is associated with causal  
3 changes in the way that the brain is developing --

4 BY MS. JONES:

5 Q. Sure.

6 A. -- based on the literature and research  
7 that I've conducted.

8 Q. That's fine. And my question is: For  
9 any individual teenager who might be a plaintiff in  
10 these cases, you have not evaluated whether -- for  
11 any individual teenager who is a plaintiff whether  
12 social media caused those changes for that  
13 particular teenager?

14 MS. COUCH: Vague. Asked and answered.

15 THE WITNESS: I have not reviewed or  
16 looked at the specific plaintiffs. My role in this  
17 case is to look at the broader literature and to  
18 understand the causal mechanisms by which social  
19 media is changing adolescent brain development.

20 BY MS. JONES:

21 Q. Sure. Okay.

22 Do you -- do you know, for any specific  
23 teenager who might have a claim in these -- in this  
24 lawsuit, whether anyone has offered the opinion  
25 that social media caused changes to that individual

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1 teenager's brain?

2 MS. COUCH: Objection. Outside the  
3 scope.

4 THE WITNESS: I couldn't tell you.

5 BY MS. JONES:

6 Q. Are you -- are you aware of how much  
7 any specific plaintiff in this case used social  
8 media?

9 MS. COUCH: Objection. Outside the  
10 scope.

11 MS. JONES: Counsel, I'm not sure I  
12 understand what the "scope" objection is. So I  
13 think that's an improper objection.

14 BY MS. JONES:

15 Q. You can answer my question. Go ahead.

16 MS. COUCH: Same objection.

17 THE WITNESS: That's not within the  
18 scope of the research that I've conducted.

19 BY MS. JONES:

20 Q. Well, I'm not asking you about your  
21 research.

22 MS. JONES: And I am going to object to  
23 the speaking objections.

24 BY MS. JONES:

25 Q. My question is: Are you aware for any

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1 of the individual teenagers who are plaintiffs in  
2 these cases how much any one of them used social  
3 media?

4 MS. COUCH: Objection. Outside the  
5 scope.

6 THE WITNESS: I can't speak to that.

7 BY MS. JONES:

8 Q. Do you have any awareness for any of  
9 the individual plaintiffs what specific social  
10 media platforms they used?

11 MS. COUCH: Same objection.

12 THE WITNESS: I can't speak to that.

13 BY MS. JONES:

14 Q. Do you know for what purposes any  
15 individual plaintiff used social media?

16 MS. COUCH: Same objection.

17 THE WITNESS: I can't speak to that.

18 BY MS. JONES:

19 Q. Can we agree that social media does not  
20 change the brain of every teen who uses it?

21 MS. COUCH: Objection. Vague.

22 THE WITNESS: I think there are  
23 individual differences. And my work has shown  
24 that, to the extent that one uses social media in  
25 more problematic ways, their brains are changing

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1 more in ways that are becoming hypersensitive to  
2 their peer environment that could have lasting  
3 effects on their well-being.

4 BY MS. JONES:

5 Q. Sure. And just to unpack that a little  
6 bit, you said, "To the extent that one uses social  
7 media in more problematic ways." And we'll talk  
8 about what you mean by that.

9 There are -- I assume you would  
10 acknowledge, even if you accept that your general  
11 proposition is true, there are teenagers for whom  
12 the use of social media does not change their brain  
13 development?

14 MS. COUCH: Asked and answered.

15 THE WITNESS: As I said, the ways in  
16 which adolescents use social media, the more  
17 problematic, that social media use will  
18 fundamentally change the way their brain is  
19 developing over the long term.

20 BY MS. JONES:

21 Q. Okay. But if they're -- and if -- it  
22 sounds like embedded in your answer you acknowledge  
23 that there are forms of social media use for  
24 teenagers that are not problematic, yes?

25 MS. COUCH: Asked and answered.

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1 BY MS. JONES:

2 Q. Can we agree on that basic idea, that  
3 social media use is not problematic for all  
4 teenagers, right?

5 MS. COUCH: Vague.

6 THE WITNESS: There's variability and  
7 the extent to which it might be problematic for  
8 somebody, with some teens experiencing much more  
9 problematic use than others.

10 BY MS. JONES:

11 Q. Are you -- are you offering the opinion  
12 under oath that for every teenager who uses social  
13 media that it's always problematic in some form?

14 MS. COUCH: Asked and answered.

15 THE WITNESS: As I said, there are  
16 individual differences and variability and how  
17 problematic it is, ranging from low levels to  
18 extremely high levels of problematic use.

19 BY MS. JONES:

20 Q. Sure. But for some teenagers, social  
21 media use is not problematic -- right? -- even  
22 under your theory?

23 MS. COUCH: Vague.

24 BY MS. JONES:

25 Q. Right?

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1 MS. COUCH: Same objection.

2 THE WITNESS: There's variability in  
3 the population with problematic use, ranging from  
4 low levels to extremely high levels of problematic  
5 use.

6 BY MS. JONES:

7 Q. But are you offering the opinion that  
8 all use of social media by teenagers is problematic  
9 use by definition?

10 MS. COUCH: Object to the form.

11 THE WITNESS: The ways in which  
12 adolescents use social media based on many of the  
13 platform features make it much more harmful for  
14 them. And I discuss in my report all of those  
15 features of social media that make it more harmful.

16 BY MS. JONES:

17 Q. Okay. Is there anywhere that I would  
18 find in your published works where you have said  
19 social media use is problematic for all teenagers  
20 to some extent?

21 MS. COUCH: Vague.

22 THE WITNESS: As I said, there's  
23 variability in how problematic social media is,  
24 ranging from low levels of problematic use to very  
25 high levels of problematic use.

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1 BY MS. JONES:

2 Q. Well, let -- let me ask you a kind  
3 of -- a more specific question.

4 If a teenager uses social media for  
5 15 minutes a day to connect with friends from  
6 school and family members, would you characterize  
7 that as problematic use under your theory?

8 A. I would need --

9 MS. COUCH: Objection --

10 Let me get my objection in.

11 THE WITNESS: Yeah.

12 MS. COUCH: Objection. Incomplete  
13 hypothetical. Vague.

14 THE WITNESS: I would need to see a  
15 specific example and more data to be able to speak  
16 to that.

17 BY MS. JONES:

18 Q. What more would you need to know --

19 MS. COUCH: Objection.

20 BY MS. JONES:

21 Q. -- to determine whether that teenager's  
22 use is problematic, 15 minutes a day communicating  
23 with friends from school and family members?

24 MS. COUCH: Objection. Vague.

25 Calls -- incomplete hypothetical. And calls for

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1 speculation.

2 THE WITNESS: In that hypothetical,  
3 it's hard to say. I would need a specific example  
4 from data with more understanding of what it is  
5 that they -- what features they're using, what  
6 they're being -- what they're doing on that  
7 platform.

8 Time spent on social media is not the  
9 end-all be-all. It's the features of social media  
10 that make it more problematic.

11 BY MS. JONES:

12 Q. Well, and the content, right?

13 What -- what teens actually see on  
14 social media is part of what might create an issue  
15 under your theory, right?

16 MS. COUCH: Objection. Vague.

17 THE WITNESS: The content is changed by  
18 the features of social media, and those features  
19 are what make it harmful.

20 BY MS. JONES:

21 Q. Okay. So is there any scenario in  
22 which you would say a teen could use social media  
23 and it not be problematic?

24 MS. COUCH: Objection. Vague.

25 THE WITNESS: It's difficult to

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1 speculate in these hypotheticals.

2 BY MS. JONES:

3 Q. Sure. But I'm just -- you understand  
4 this is our opportunity to understand exactly what  
5 the metes and bounds are of your opinions, and I  
6 want to make sure I understand.

7 Are you offering the opinion that  
8 teen -- any teenager -- any teen use of social  
9 media is problematic?

10 MS. COUCH: Objection. Vague.

11 BY MS. JONES:

12 Q. Is that your opinion?

13 A. My opinion is: The ways in which the  
14 platforms affect those experiences, based on those  
15 features, make it more or less risky and harmful  
16 for adolescents, and that problematic social media  
17 use varies among adolescents from low levels to  
18 extremely high levels.

19 Q. And is it your testimony that every  
20 teenager who uses social media experiences brain  
21 changes, whether they're big or small?

22 MS. COUCH: Asked and answered.

23 THE WITNESS: There are variabilities  
24 within the population. That level of problematic  
25 use can determine the ways in which the brain is

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1 changing.

2 BY MS. JONES:

3 Q. Okay. For the specific plaintiffs  
4 involved in this litigation, do you know anything  
5 about what was going on in their individual lives  
6 beyond the fact that they were using social media?

7 MS. COUCH: Asked and answered.

8 THE WITNESS: I couldn't tell you.

9 BY MS. JONES:

10 Q. Could you agree with me that what else  
11 is going on in a teenager's life affects that  
12 teenager's mental health and well-being, generally  
13 speaking?

14 MS. COUCH: Calls for speculation.

15 Broad. Vague.

16 BY MS. JONES:

17 Q. You can't agree with that, or can you?

18 A. Broadly speaking, there are lots of  
19 things that contribute to adolescents' daily lives.

20 Q. Including things outside of social  
21 media, yes?

22 MS. COUCH: Broad. Incomplete  
23 hypothetical.

24 THE WITNESS: It's hard to speak on  
25 that hypothetical.

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1 BY MS. JONES:

2 Q. Yeah.

3 MS. JONES: Counsel, the speaking  
4 objections are inappropriate.

5 MS. COUCH: You make them in California  
6 State Court. I'm sure you're aware.

7 MS. JONES: I -- I don't -- frankly, I  
8 don't live in California. I think the -- I think  
9 the speaking objections are inappropriate. If they  
10 continue, we might have to get --

11 MS. COUCH: No. You make -- I'm sure  
12 someone here can tell you, in California State  
13 Court, you have to give the opportunity to correct  
14 the question --

15 MS. JONES: Yeah, you can -- I -- I --

16 MS. EHLE: Just say, "Objection to  
17 form."

18 MS. JONES: I'm -- I --

19 MS. COUCH: No, you don't.

20 MS. JONES: Counsel --

21 MS. COUCH: Not in California State  
22 Court. I have the code.

23 MS. JONES: You are -- you are welcome  
24 to object to form if there is something that I can  
25 correct about the question in terms of the form of

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1 the question. It's not appropriate for you to be  
2 channeling answers to your witness.

3 BY MS. JONES:

4 Q. Dr. Telzer --

5 MS. COUCH: I will continue --

6 BY MS. JONES:

7 Q. -- let me go back --

8 MS. COUCH: -- to make my objections  
9 per California code.

10 MS. JONES: Well, our objection is  
11 noted. If we need to call the judge on --

12 MS. COUCH: You're welcome to.

13 MS. JONES: -- lunch break, we will do  
14 that.

15 MS. COUCH: I have her number.

16 BY MS. JONES:

17 Q. Dr. Telzer, before the back-and-forth  
18 with your lawyer, I think you had agreed that there  
19 are other things that affect a teenager's mental  
20 health and well-being beyond social media. Is that  
21 fair to say?

22 A. There are many things that affect  
23 adolescents in their daily lives.

24 Q. Okay. And that can include what's  
25 going with -- on with them at school, right?

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1 A. School can impact adolescents.

2 Q. Okay. That can include what's going on  
3 in their home life, yes?

4 A. Home can impact adolescents.

5 Q. Okay. That can include whether a  
6 teenager has suffered any sort of physical abuse or  
7 harm, right?

8 A. Yes.

9 Q. And you understand that there is data  
10 to support the view that the pandemic impacted the  
11 well-being of some teenagers, yes?

12 A. Yes.

13 MS. COUCH: Lacks foundation.

14 Let me get my objection in, Dr. Telzer.

15 BY MS. JONES:

16 Q. For any individual plaintiff in these  
17 cases, do you know one way or the other whether the  
18 claimed harms were caused by anything that any of  
19 the defendants did or did not do for the individual  
20 plaintiffs in these cases?

21 MS. COUCH: Objection. Outside the  
22 scope.

23 THE WITNESS: I couldn't say.

24 BY MS. JONES:

25 Q. And am I right in understanding that

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1 part of the reason you couldn't say that is because  
2 you don't know anything about the individual  
3 plaintiffs' circumstances, family, school, what  
4 else was going on with them?

5 MS. COUCH: Asked and answered.

6 BY MS. JONES:

7 Q. Is that fair?

8 A. I don't need to know about those  
9 individual circumstances. That's not the point of  
10 my report or opinions.

11 Q. And -- and just to be very clear what  
12 you mean by "that's not the point," it wasn't the  
13 point of your report and opinions to draw  
14 conclusions about whether for any individual  
15 plaintiff something that happened with them was  
16 caused by social media, right?

17 MS. COUCH: Asked and answered. Calls  
18 for a legal reasoning.

19 THE WITNESS: That's outside of the  
20 scope of my role here to understand the broad  
21 literature of how social media is causally  
22 impacting adolescent brain development.

23 BY MS. JONES:

24 Q. Dr. Telzer, let me ask you to go to  
25 Page 6 of your report. You can look at whatever

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1 version of it that you want to.

2 At the very top of your -- of Page 6,  
3 there is a bullet point that begins with: In  
4 addition to.

5 Do you see that?

6 A. Uh-huh.

7 Q. You have to say "yes" or "no."

8 A. Yes.

9 Q. It says: In addition to these clinical  
10 effects, heavy social media use changes the  
11 development of the adolescent brain, altering it  
12 from what would have been considered typical prior  
13 to the advent of social media.

14 Do you see that?

15 A. Yep.

16 Q. And I want to ask, before we get into  
17 the kind of talking about that a little bit more:  
18 Have you ever published that specific position in  
19 your peer-reviewed work?

20 A. This opinion is based on the totality  
21 of all the literature review and research that I  
22 have done.

23 Q. Sure. My question is more specific.

24 If I looked at everything that you had  
25 co-authored --

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1 A. Uh-huh.

2 Q. -- or authored on your own and  
3 published in the peer-reviewed literature, would I  
4 find that opinion expressed anywhere?

5 MS. COUCH: Objection. Vague. Asked  
6 and answered.

7 THE WITNESS: This opinion is based on  
8 all of the literature that I reviewed. These --  
9 this specific opinion is based on many different  
10 studies that have been conducted and my review of  
11 all of that literature.

12 BY MS. JONES:

13 Q. Okay. So it sounds like you could not  
14 point me to a specific study today where you have  
15 used that particular -- offered that particular  
16 view that you have published?

17 MS. COUCH: Asked and answered.

18 THE WITNESS: This is --

19 BY MS. JONES:

20 Q. Let me ask the question a different  
21 way.

22 We have actually looked at, I think,  
23 just about everything you've ever written. And  
24 nowhere in your peer-reviewed publications have I  
25 seen you offer the opinion as an academic, as a

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1 researcher that heavy social media use changes the  
2 development of the adolescent brain, altering it  
3 from what would have been considered typical prior  
4 to the advent of social media.

5 I have not seen that, the team has not  
6 seen that in any of your published work.

7 Am I missing something in something  
8 that you have co-authored or authored in the  
9 peer-reviewed literature where you have offered  
10 that opinion?

11 MS. COUCH: Objection. Misstates --  
12 BY MS. JONES:

13 Q. Are you thinking of something that I  
14 have somehow not seen?

15 MS. COUCH: Objection. Misstates her  
16 testimony. Lacks foundation. Asked and answered.

17 MS. JONES: I don't know how she could  
18 lack foundation to answer questions about her own  
19 research.

20 MS. COUCH: Your question lacks the  
21 foundation.

22 BY MS. JONES:

23 Q. Can you answer my question, Dr. Telzer?

24 A. This opinion is based on the totality  
25 of all of the research and the combination of all

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1 of those studies and research together.

2 Q. Okay. So you think your research  
3 collectively adds up to heavy social media use  
4 changes the development of the adolescent brain,  
5 altering it from what would have been considered  
6 typical prior to the advent of social media?

7 MS. COUCH: Misstates her answer.

8 THE WITNESS: My opinion is based on my  
9 research as well as the review of all of the  
10 literature. And the totality of that is what is  
11 based -- is what my opinion is based on.

12 BY MS. JONES:

13 Q. But there's not -- there's not a  
14 specific article you're thinking of. I just want  
15 to make sure that we have not missed something.

16 There is not a specific article that  
17 you're thinking of where you've said that?

18 MS. COUCH: Asked and answered.

19 THE WITNESS: Is there?

20 BY MS. JONES:

21 Q. I'm -- I'm legitimately curious. Is  
22 there a specific article that you're thinking of  
23 where you have offered that view?

24 I understand your point about  
25 everything all together culminates in that. My

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1 question is: Is there a specific article that you  
2 have in mind where you've offered that opinion?

3 MS. COUCH: Argumentative. Asked and  
4 answered.

5 THE WITNESS: This opinion is based on  
6 all of the research together, both my research and  
7 the research of other scientists out there. And  
8 the totality of that together is what my opinion is  
9 based upon.

10 BY MS. JONES:

11 Q. Okay. So I'm not missing something, it  
12 sounds like.

13 Do you agree that there's a difference  
14 between "association" and "causation"?

15 MS. COUCH: Vague.

16 THE WITNESS: I would say that it is --  
17 it's tricky to understand that without more  
18 context.

19 BY MS. JONES:

20 Q. In the context of your work as an  
21 academic researcher --

22 A. Uh-huh.

23 Q. -- are you familiar with the concept of  
24 there being a difference between "association" and  
25 "causation"?

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1 A. The two are often used interchangeably.  
 2 Q. Well, that was not my question.  
 3 My question was: Are you aware of  
 4 there being a difference between "association" and  
 5 "causation"?  
 6 MS. COUCH: Asked and answered.  
 7 THE WITNESS: Those are two -- those  
 8 are two different words.  
 9 BY MS. JONES:  
 10 Q. Okay. And, in fact, they -- they are  
 11 also two different concepts, right?  
 12 A. Not necessarily. They're used  
 13 interchangeably often in research.  
 14 Q. Okay. But they are often very  
 15 expressly treated as different things, right?  
 16 MS. COUCH: Vague.  
 17 BY MS. JONES:  
 18 Q. Let me ask you this way. Two things  
 19 can be associated with each other, but there might  
 20 not be a causal relationship between the two; is  
 21 that right?  
 22 A. We often use the word "association" to  
 23 mean that one is likely to cause the other.  
 24 Q. That's -- that's not my question.  
 25 My question was: Two things can be

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1 associated with each other --  
 2 A. Uh-huh.  
 3 Q. -- but they might not have a causal  
 4 relationship, right?  
 5 MS. COUCH: Objection. Vague and  
 6 ambiguous.  
 7 THE WITNESS: Without seeing it  
 8 specifically, it's hard to answer that.  
 9 BY MS. JONES:  
 10 Q. You can't answer the question of  
 11 whether there are two -- you can have two things  
 12 that are associated but aren't necessarily causally  
 13 related?  
 14 MS. COUCH: Argumentative. Asked and  
 15 answered.  
 16 THE WITNESS: I would need a specific  
 17 example to answer that specifically.  
 18 BY MS. JONES:  
 19 Q. Okay. Is there a difference between  
 20 "correlation" and "causation"?  
 21 MS. COUCH: Vague.  
 22 THE WITNESS: Similarly, we will often  
 23 use the two terms sometimes interchangeably.  
 24 BY MS. JONES:  
 25 Q. Who is "we"? You use the terms

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1 "correlation" and "causation" interchangeably?  
 2 A. The two words are often used to mean  
 3 the same thing. We know that, I think, a -- a  
 4 correlation can be causal.  
 5 Q. In -- in your -- well, that's certainly  
 6 true. It's possible that two things that are  
 7 correlated may --  
 8 A. Uh-huh.  
 9 Q. -- also be causal --  
 10 A. Uh-huh.  
 11 Q. -- causally related. Yes?  
 12 A. Uh-huh.  
 13 Q. Yes? You have to say "yes" or "no."  
 14 A. Yes.  
 15 Q. But you can have two things that are  
 16 correlated with each other that are not, in fact,  
 17 causally related, right?  
 18 A. You can have two things that are  
 19 correlated that are not causal.  
 20 Q. Okay. And, similarly, you can have --  
 21 you can have two things that are associated with  
 22 each other where there is a causal relationship,  
 23 right?  
 24 A. Yes.  
 25 Q. But you can also have two things that

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1 are associated with each other that are not  
 2 causally related, right?  
 3 A. Generally speaking.  
 4 Q. Okay. In -- in your -- in your work as  
 5 an academic researcher and someone who publishes in  
 6 the peer-reviewed literature --  
 7 A. Uh-huh.  
 8 Q. -- do you aim to be precise?  
 9 MS. COUCH: Objection. Vague.  
 10 THE WITNESS: I mean --  
 11 BY MS. JONES:  
 12 Q. Let me ask more specifically.  
 13 A. Yeah.  
 14 Q. Do you aim to be precise in your use of  
 15 terminology when you are publishing in the  
 16 peer-reviewed literature?  
 17 MS. COUCH: Objection. Vague.  
 18 THE WITNESS: Yeah, it's difficult to  
 19 answer so -- with such a broad stroke. Of course I  
 20 want to be precise.  
 21 BY MS. JONES:  
 22 Q. Okay. You want to be precise.  
 23 And -- and, in fact, the -- the peer  
 24 review process, part of the purpose of the peer  
 25 review process is so people outside of just the

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1 authors have a chance to look at the data and how  
2 you've described it and described your findings,  
3 right?

4 A. Correct.

5 Q. And part of the peer review process is  
6 intended to try to encourage precision. Is that  
7 fair to say --

8 A. Correct.

9 Q. -- generally speaking?

10 Do you, in your academic research and  
11 written work, use the words "association" and  
12 causation interchangeably when you submit something  
13 for peer review?

14 A. In my peer review, "association" often  
15 means "causal." For -- with all due respect, in  
16 academic language, we often don't use the word  
17 "causal" in any specific example and use the word  
18 "associate."

19 Q. Yeah, I'm not sure that was an answer  
20 to my question.

21 My question is: When you submit  
22 something for peer review --

23 A. Uh-huh.

24 Q. You have to say "yes" or "no." I'm  
25 just letting you know since I hear you "uh-huh,"

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1 which is a natural impulse.

2 When you submit something for peer  
3 review, are you using the words "association" and  
4 "causation" interchangeably?

5 MS. COUCH: Vague.

6 THE WITNESS: We often use the word  
7 "association" as a form of causation in our  
8 research in a singular empirical article.  
9 Depending on the method used, we may use those two  
10 words interchangeably.

11 BY MS. JONES:

12 Q. Have you -- can you think of a specific  
13 circumstance where you've done that, where instead  
14 of -- where you have used the word "association" to  
15 mean "causation"? Is there something you're  
16 thinking of specifically?

17 A. Not specifically.

18 Q. Okay. Same question with respect to  
19 "correlation." When you are submitting your  
20 academic written work for peer review, are you  
21 using the words "correlation" and "causation"  
22 interchangeably?

23 A. In our peer-reviewed -- or in my  
24 peer-reviewed research, we use the word  
25 "correlation" very narrowly to mean that we ran a

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1 correlation analysis. So we would not use those  
2 words interchangeably because the statistic is a  
3 correlation.

4 Q. Okay. I actually want to show you --  
5 Ms. Antoine is going to yell at me.

6 I actually want to show you another  
7 video. This is going to be Tab 54-D. And -- and I  
8 should tell you, Dr. Telzer, we have the full  
9 videos. If your counsel wants to show you the  
10 whole thing on the lunch break and you have  
11 something -- you know, there's some different thing  
12 in there you want to bring up, you can. But for  
13 time purposes, I'm showing you the stuff that we  
14 need to ask you about.

15 MS. COUCH: So will you send us the  
16 full video --

17 MS. ANTOINE: Yes.

18 MS. COUCH: -- via email?

19 And then, Dr. Telzer, you're welcome to  
20 answer the questions, if you can, based upon a  
21 selective showing.

22 MS. JONES: Of course she's permitted  
23 to answer the question. She's under oath.

24 (TELZER EXHIBIT 9, 2023 WRAL-TV News  
25 Clip, was marked for identification.)

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1 MS. JONES: Okay. Let's play Tab 54.  
2 This is going to be Exhibit 9 to the deposition.

3 THE TECHNICIAN: This is D as in "dog"?

4 MS. JONES: Yes, please.

5 (Playing video.)

6 BY MS. JONES:

7 Q. Dr. Telzer, that was you, just to be  
8 clear, yes?

9 A. Correct.

10 Q. Okay. And we can get you something  
11 separately to kind of establish the date, but I  
12 will represent to you that that was an interview  
13 that you gave in May of 2023.

14 Do you remember giving that interview  
15 to WRAL in May of 2023?

16 A. Yes.

17 Q. Okay. And I want to ask you about a  
18 couple of things that you said. One is, "The data  
19 are continuing to come out, and there's just not  
20 enough causal evidence yet to make these claims  
21 that social media is causing depression."

22 You saw that, yes?

23 A. Yes.

24 Q. Was -- let me just ask you generally:  
25 When you go on the news and offer your views to the

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1 public on these issues, you are aiming to be  
2 honest, yes?

3 A. Correct.

4 Q. You are aiming to be accurate, yes?

5 A. Correct.

6 Q. You would not go out on the news and  
7 knowingly say something that you did not believe to  
8 be true. Is that fair to say?

9 A. Yes.

10 Q. Okay. And so you said -- and when you  
11 said, "The data are continuing to come out and  
12 there's just not enough causal evidence yet to make  
13 these claims that social media is causing  
14 depression," was that what you believed in 2023?

15 MS. COUCH: Objection. Vague.

16 THE WITNESS: The literature has  
17 accumulated exponentially. I can't necessarily  
18 speculate on 2023 or recall specifically. But  
19 since then, we can make -- based on the totality of  
20 all of the research and all of the emerging studies  
21 that have come out, including several this week  
22 that are coming out with using these more rigorous  
23 methods -- longitudinal designs, within-person  
24 designs, experimental designs -- all of those  
25 together can really confidently now tell us that

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1 there are causal links between social media use and  
2 depression.

3 BY MS. JONES:

4 Q. Okay. And we'll come back to what you  
5 think has happened up to today. My question is:  
6 In May of 2023, did Dr. Eva Telzer believe it was  
7 true that data are continuing to come out and  
8 there's just not enough causal evidence yet to make  
9 these claims that social media is causing  
10 depression? Did you believe that when you said it  
11 on the news in 2023?

12 MS. COUCH: Asked and answered. Calls  
13 for speculation.

14 THE WITNESS: I can't speculate on my  
15 beliefs in 2023. I said that statement, yes.

16 BY MS. JONES:

17 Q. You said the statement. And you told  
18 me, "I don't go on the news and try to lie to  
19 people," right?

20 A. Uh-huh.

21 Q. Yes?

22 A. Yes.

23 Q. Okay. And so if you got up on the news  
24 and said something, it's probably reasonable to  
25 conclude that you were aiming to be accurate, yes?

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1 A. Yes.

2 Q. All right.

3 MS. COUCH: Objection. Argumentative.

4 BY MS. JONES:

5 Q. Even though you can't speculate about  
6 what you thought two years ago, we can safely  
7 conclude Dr. Telzer in May of 2023 did not go on  
8 WRAL and tell the people of this community  
9 something she did not believe to be true as an  
10 academic, correct?

11 MS. COUCH: Argumentative.

12 BY MS. JONES:

13 Q. We can assume that, yes?

14 A. What I --

15 MS. COUCH: Same objection.

16 BY MS. JONES:

17 Q. Let me ask my question again given all  
18 the objections.

19 We can assume, based on what you've  
20 told me about your desire to be accurate and  
21 truthful when you communicate about your views --

22 A. Uh-huh.

23 Q. -- that you did not go out on the news  
24 in 2023 and tell the people of this community  
25 something that you did not believe to be true,

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1 right?

2 MS. COUCH: Same objection.

3 THE WITNESS: I said those sentences  
4 that you read. There's not the broader context of  
5 the literature that has come out since then.

6 BY MS. JONES:

7 Q. Sure. And I'm just -- I'm just talking  
8 about the 2023 version of yourself, okay?

9 A. Sure.

10 Q. We were all different people and  
11 younger. But in 2 -- I certainly was.

12 In 2023, Dr. Telzer believed and told  
13 the world that data are continuing to come out;  
14 there's just not enough causal evidence yet to make  
15 these claims that social media is causing  
16 depression, right?

17 MS. COUCH: Argumentative. Asked and  
18 answered.

19 THE WITNESS: In that interview, I said  
20 those words that you've read.

21 BY MS. JONES:

22 Q. And you believed them, right?

23 MS. COUCH: Same objection.

24 THE WITNESS: I can't speculate on my  
25 beliefs at the time.

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1 BY MS. JONES:

2 Q. You don't know if you believed what you  
3 said on the news in 2023?

4 MS. COUCH: Argumentative. Asked and  
5 answered.

6 THE WITNESS: I said those statements.  
7 I also had a broader -- there's a broader context  
8 to that. I also went on to say that these effects  
9 are there; that social media is related to  
10 depressive symptoms; there may be bidirectional  
11 effects. But I did not say that social media does  
12 not relate to depression.

13 BY MS. JONES:

14 Q. Well, what you said was, "There's not  
15 enough causal evidence yet to make these claims  
16 that social media is causing depression." Those --  
17 those are the words you said, yes?

18 MS. COUCH: Misstates the full  
19 interview.

20 THE WITNESS: I said those statements.

21 BY MS. JONES:

22 Q. Okay.

23 A. There's the broader context.

24 Q. Okay. That's fine.

25 Have you gone back to WRAL and said,

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1 "I, Dr. Telzer, have changed my mind, and I now  
2 think that social media causes depression"?

3 MS. COUCH: Misstate --

4 BY MS. JONES:

5 Q. Yes or no?

6 MS. COUCH: Misstates her testimony.

7 You don't have to give a "yes" or "no"  
8 question -- answer. You can answer fuller.

9 BY MS. JONES:

10 Q. My -- my question is actually pretty  
11 direct and pretty simple, I think.

12 My question is: Now that you have  
13 determined that social media does cause depressive  
14 symptoms or brain changes that lead to depressive  
15 symptoms, have you gone back to WRAL and said,  
16 "Hey, I've now concluded that, in fact, causation  
17 does exist"?

18 MS. COUCH: Misstates her testimony.

19 THE WITNESS: There is mounting  
20 evidence, and the science is continuing to inform  
21 our knowledge.

22 It is an iterative process. We can't  
23 go back and correct every earlier piece that  
24 existed. We continue to build upon what we know  
25 and make these...

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1 The purpose of this, my opinions are  
2 here for the purposes of our case, having done all  
3 of this research on all of the emerging research  
4 that has come out.

5 BY MS. JONES:

6 Q. Sure. The -- the -- the long report  
7 you generated being paid by the lawyers, I  
8 understand, you did that in a specific context.

9 If you had concluded that social media  
10 was causing depression in young people, do you not  
11 think that's something that you should tell  
12 somebody outside of the context of litigation if  
13 you really thought that were true?

14 MS. COUCH: Argumentative. Misstates  
15 her prior testimony.

16 THE WITNESS: I continue to update and  
17 talk to the community and schools and teenagers and  
18 teachers all the time about my opinion that social  
19 media is causing and disrupting adolescents'  
20 well-being.

21 BY MS. JONES:

22 Q. Okay. You think you've said that out  
23 in the world?

24 A. Yes.

25 Q. Okay.

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1 MS. COUCH: We need to take a break. I  
2 would think a lunch break would make sense, but --  
3 given that it's 12:22 p.m. and I see that it's  
4 here. But if you would like to discuss that  
5 otherwise, let me know.

6 MS. JONES: I don't mind taking a  
7 break, but I'd like to finish this one little bit  
8 before we do that.

9 MS. COUCH: I need to take a break now.  
10 So I can be back in five minutes.

11 MS. JONES: Okay. Can your -- can we  
12 otherwise sit here and wait for you to come back if  
13 we're breaking for you specifically?

14 MS. COUCH: You can do whatever.

15 MS. JONES: I'm sorry. Can we go off  
16 the record, please? Because I don't want to use my  
17 time on this.

18 THE VIDEOGRAPHER: Going off the  
19 record. The time is 12:22 p.m.

20 \* \* \*

21 (Whereupon, there was a recess in the  
22 proceedings from 12:22 p.m. to 12:27 p.m.)

23 \* \* \*

24 THE VIDEOGRAPHER: Going back on the  
25 record. The time is 12:27 p.m.

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(TELZER EXHIBIT 10, Heels Care Network document titled Mental Health Seminar: Digital Minds, was marked for identification.)

BY MS. JONES:

Q. Okay. Dr. Telzer, I'm going to hand you what we've marked as Exhibit Number 10.

And earlier we showed you what I think was our Exhibit Number 1, which is the -- which was the video of you discussing this issue of whether there needs to be caution in making causal claims.

Do you remember generally us talking about that video? If you need to see it again, I can show it to you.

A. I think so, yeah.

Q. Okay.

A. I mean, when you just showed a slide? I'm sorry. I don't -- maybe I don't recall.

Q. We showed a slide from a larger video.

A. Yep.

Q. Do you remember that?

A. Yep.

Q. Okay.

MS. COUCH: And I would just request again. Please send us the --

MS. JONES: Yes.

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MS. COUCH: -- exhibits you are showing her.

MS. ANTOINE: The Wi-Fi makes it very hard to download, so...

BY MS. JONES:

Q. Dr. Telzer --

MS. JONES: And, Ryan, do we have the full video that --

THE TECHNICIAN: Yes.

MS. JONES: -- we could show just the beginning part of it? I just want to -- her to be able to see the first --

THE TECHNICIAN: Of which one?

MS. JONES: 78, I'm sorry. While you're looking for that...

BY MS. JONES:

Q. Dr. Telzer, what I've handed you is what we've marked as Exhibit Number 10.

Do you see Exhibit Number 10?

A. Uh-huh.

Q. You have to say "yes" or "no."

A. Yes.

Q. And you see that -- this is something that we printed off of a website for the Heels Care Network.

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Do you see that?

A. I see that.

Q. And the heading is "Mental Health Seminar: Digital Minds," yes?

A. Yes.

Q. And you see the date there is February 18th, 2025, yes?

A. Uh-huh.

Q. You have to say "yes" or "no."

A. Yes.

Q. It goes on to say: The first seminar in the spring 2025 Mental Health Seminar series, "Digital Minds: Brain Development in the Age of Technology."

Do you see that?

A. Uh-huh.

Q. You have to say "yes" or "no."

A. Yes.

Q. Do you see that you're specifically featured there as the speaker at that seminar in 2025?

A. Yep.

Q. Okay. Do you -- and if you look at the second page of Exhibit Number 10, there is --

MS. JONES: Do we have it?

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BY MS. JONES:

Q. -- there is a specific reference at the bottom to -- there's a picture of you. Up in the upper right-hand corner, that's you, yes?

A. Yes.

Q. And then at the bottom, it says: The mental health seminar took place on February 17th, from 12 p.m. to 1:30 p.m. via Zoom.

Do you see that?

A. Yeah.

Q. Do you recall participating in that seminar?

A. Yes.

Q. Okay. Now, I'm going to represent to you that what we showed you at the beginning of the deposition --

A. Uh-huh.

Q. -- was from that seminar. Does that sound accurate to you, or do I need to show you the first part of it?

A. Do you mean the slide that you put up is from this?

Q. Yes. Yes.

A. Sure.

Q. Okay.

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MS. JONES: Can we just show the first part of that so she can see the -- the first slide that shows the title of the seminar?

(Playing video.)

MS. JONES: Okay. Can we pause it there, please?

BY MS. JONES:

Q. Okay. Dr. Telzer, you now have in front of you what was the first slide from the presentation that was given in February of 2025.

Do you see that?

A. Uh-huh.

Q. You have to say "yes" or "no."

A. Yes.

Q. And the title of the slide matches what's reflected here in Exhibit 10: "Digital Minds: Brain Development in the Age of Technology."

Do you see that?

A. Yes.

Q. Okay. Do you now recognize that as the seminar that you participated in just four months ago in 2025?

A. Yes.

Q. Okay. And so the statements that you

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made --

MS. JONES: You can take that down.

BY MS. JONES:

Q. The statements that you made at that time with respect to: We need to be a little bit cautious in making these causal claims, that was just earlier this year, yes?

MS. COUCH: Asked and answered.

THE WITNESS: The -- that's -- are you quoting --

BY MS. JONES:

Q. Yes.

A. -- from earlier today from what you pulled up?

Q. Yes.

A. Is that what you said? Sure.

Q. Yes. Okay.

And so you -- what I think you testified to earlier was that since your news interview in 2023, there's been this accumulation of additional evidence. Yes?

A. Yes.

Q. Okay. But in February of 2025, you still -- you said, among other things, to be fair: Causal data are largely unavailable because it is

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sometimes hard to say with some of our methods that social media causes some of these outcomes. Yes?

A. In the beginning of -- sorry.

Q. I apologize. I don't want to be rude, but I am time limited.

My question is simply: Did you say that?

MS. COUCH: Objection. Incomplete representation of her interview.

THE WITNESS: In the broader context of that talk, that was a very early slide saying that prior literature suggests that it is difficult to make some of those causal claims if we rely on certain types of studies.

I then go on to talk about how the majority of adolescents are addicted to social media, how social media is changing the developing brain, how adolescents are experiencing significant digital stress that is leading to depression a year later. And I go on to make very -- very consistent claims that I have here in my report.

MS. JONES: Okay. And I'm -- I don't mean to be rude, but I'm going to move to strike all of that as being nonresponsive to my question.

BY MS. JONES:

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Q. My question was, simply: Did you say those words in February of 2025?

MS. COUCH: Objection. Argumentative. Asked and answered.

THE WITNESS: I said those words in the broader context of a talk that I gave --

BY MS. JONES:

Q. Sure.

A. -- that was over an hour long.

Q. Sure.

A. That was a beginning slide setting the context for some of the earlier work.

And we go on to give very detailed examples of how social media is leading to things like social media addiction and changes in the developing brain and depression.

Q. Okay. Okay. Earlier I had asked you --

(TELZER EXHIBIT 11, Document titled Momentary Links Between Adolescents' Social Media Use and Social Experiences and Motivations: Individual Differences by Peer Susceptibility, was marked for identification.)

BY MS. JONES:

Q. Okay. I'm handing you what we've

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1 marked as Exhibit Number 11. Do you recognize  
2 Exhibit Number 11?

3 A. Yes.

4 Q. Okay. And Exhibit Number 11 is a paper  
5 that was co-authored by you in 2023, yes?

6 A. Yes.

7 Q. And, actually, I mostly wanted to ask  
8 you about a couple of small points. On Page --

9 And you remember this paper, yes?

10 A. Yes.

11 Q. Okay. Go to Page 15, if you would,  
12 please, of Exhibit Number 11.

13 There's a section down at the bottom of  
14 that page that says "Limitations and Future  
15 Directions," yes?

16 A. Yes.

17 Q. And we were talking earlier about the  
18 fact that it's very common that for literature  
19 that's published in academic journals or other  
20 types of peer-reviewed journals, that authors will  
21 include limitations, right?

22 A. Correct.

23 Q. And the purpose of the limitation  
24 section is to say, we did this work; this is what  
25 the data tells us, but you need to also be aware of

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1 potential limits on the ability to -- limits on how  
2 we did the study or limits on the interpretation of  
3 the data? Fair? Generally speaking.

4 A. Limitation sections generally try to  
5 frame the data for -- including relatively  
6 boilerplate things that could be considered  
7 limitations to the specific study.

8 Q. Okay. And you said the word  
9 "boilerplate."

10 A. Yeah.

11 Q. When you, in a paper that you are  
12 co-author on, include a section on limitations,  
13 you're not just making stuff up, are you?

14 MS. COUCH: Objection. Argumentative.

15 THE WITNESS: -- we are not making  
16 things up.

17 BY MS. JONES:

18 Q. Okay. You would not include something  
19 in the limitation section unless you thought that  
20 it was a valid statement of the limitations of the  
21 study, yes?

22 MS. COUCH: Objection. Argumentative.

23 THE WITNESS: We are making statements  
24 in a single publication about that study.

25 BY MS. JONES:

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1 Q. Yeah.

2 That -- my question is: You would not  
3 include something in the limitation section of a  
4 study that you were a co-author on unless you  
5 believed it was a valid statement of the  
6 limitations of the study?

7 MS. COUCH: Asked and answered.

8 THE WITNESS: Yes. These limitations  
9 are based on our understanding of potential  
10 limitations in the singular study that we're  
11 reporting here.

12 BY MS. JONES:

13 Q. And that -- that would be the case --  
14 am I right in assuming? -- as to all of your  
15 papers?

16 If you have a limitation section in a  
17 paper that Dr. Telzer has co-authored and there are  
18 limitations laid out, those are valid statements of  
19 what you and your co-author colleagues believe to  
20 be limits in the study, yes?

21 MS. COUCH: Objection. Vague.  
22 Compound.

23 THE WITNESS: I would have to see  
24 specific examples of other studies. But we include  
25 limitation sections in publications and would --

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1 those are the limitations of each singular study.

2 BY MS. JONES:

3 Q. Okay. And I want to make very clear --  
4 you say, "I would need to see a specific example."  
5 Are you thinking -- are there studies that you can  
6 think of that you've been a co-author on where you  
7 included limitations and you didn't think that the  
8 limitations were valid statements?

9 A. No. I'm --

10 MS. COUCH: Objection. Vague.

11 THE WITNESS: I'm saying that I don't  
12 know of the limitations across every paper,  
13 generally speaking, without a specific.

14 BY MS. JONES:

15 Q. I'm talking about your papers. If you  
16 have put your name on a piece of literature that's  
17 published --

18 A. Uh-huh.

19 Q. -- in a journal, am I correct in  
20 thinking that, if we look at the limitation  
21 section, you have had a chance to review that and  
22 determine whether you think it's a fair statement  
23 of the limits of the study?

24 MS. COUCH: Asked and answered. Vague.

25 THE WITNESS: Yes, these are the

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1 limitations of the singular study that we're  
2 talking about.

3 BY MS. JONES:

4 Q. Okay. And the thing I wanted to ask  
5 you about is that, in that section on limitations,  
6 it says: We acknowledge limitations and highlight  
7 future directions for study --

8 A. Uh-huh.

9 Q. -- yes?

10 A. Yes.

11 Q. It says: First, our data were  
12 collected during a global pandemic that limited  
13 adolescents' in-person interactions. This timing  
14 may influence the generalizability of study  
15 findings, yes?

16 A. Yes.

17 Q. And then it says: Second, although we  
18 used robust within-subject analyses that accounted  
19 for both daily effects and between-subject  
20 characteristics, our study is correlational, not  
21 causal.

22 Do you see that?

23 A. I do.

24 Q. So this is actually a very concrete  
25 real-world example of you, Dr. Telzer, drawing a

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1 distinction between correlation and causation,  
2 right?

3 A. Correct.

4 MS. COUCH: Objection. Argumentative.

5 MS. JONES: I know your counsel wants  
6 to take a break, and I think this is a rational  
7 time to do so. So why don't we take a break.

8 THE WITNESS: Thank you.

9 THE VIDEOGRAPHER: Going off the  
10 record. The time is 12:38 p.m.

11 \* \* \*

12 (Whereupon, there was a recess in the  
13 proceedings from 12:38 p.m. to 1:17 p.m.)

14 \* \* \*

15 THE VIDEOGRAPHER: Going back on the  
16 record. The time is 1:17 p.m.

17 BY MS. JONES:

18 Q. Dr. Telzer, you, I think, testified  
19 earlier -- and forgive me if I'm misrecalling  
20 this -- that the features on social media platforms  
21 change the content. Did you -- did I hear that  
22 correctly? I just want to make sure I heard it  
23 right, and then I have some follow-up questions.

24 A. Yeah. The --

25 MS. COUCH: That misstates her

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1 testimony. But continue.

2 BY MS. JONES:

3 Q. Well, you can tell me if I'm -- if I --  
4 if you didn't say that. I just want to make sure.

5 A. I would say that the features of the  
6 social media platforms change the experience of the  
7 content.

8 Q. "Change the experience of the content."  
9 Okay. And what specific features?

10 A. I talk about these in my report on  
11 Page 46, the unique features of social media,  
12 including: the publicness; the visualness; the  
13 availability, 24/7 sort of access to these  
14 platforms; the quantifiability, so likes, comments;  
15 the algorithmic nature of it, in particular; the  
16 asynchronicity.

17 Q. Okay. I think -- I think I understand  
18 what -- I'm recalling what you're referring to.

19 When I -- and so your -- your opinion  
20 is that those -- I'll call them "elements" of  
21 social media -- you can use a different descriptor  
22 if you think it's better -- somehow change the  
23 experience of the content for teenagers?

24 A. Absolutely. The content that is on  
25 social media is -- can be fundamentally changed by

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1 these features.

2 For example, if that content has lots  
3 of likes associated with it, that changes how that  
4 content might be experienced by adolescents. The  
5 algorithmic nature of it, which feeds continuous --  
6 amplifying specific things that they might be  
7 seeing, can change that experience as well.

8 Q. Okay. So I just want to make sure that  
9 I'm correctly understanding your view here. So  
10 your view is, these elements of social media can  
11 change the experience of content on a social media  
12 platform for a teenager. Is that a fair  
13 description?

14 A. These features of social media are what  
15 make it especially harmful for adolescents.

16 Q. Okay. But I -- I understand your  
17 opinion on that. But I mostly want to just make  
18 sure I understand what you're saying about the  
19 content and how the content relates to the  
20 different features that you've described.

21 When you're -- when you referred to  
22 features earlier, you weren't talking about  
23 necessarily the specific features of every single  
24 platform. You were talking about there are things  
25 about social media that affect the way a teenager

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1 might experience content?

2 MS. COUCH: Objection. Vague.

3 THE WITNESS: There are features on  
4 these platforms shared across all the platforms  
5 that make the experience particularly harmful for  
6 adolescents.

7 BY MS. JONES:

8 Q. Sure. Sure. Okay. And I'm sorry for  
9 stepping on the end of your sentence.

10 But the features don't change the  
11 content itself, correct?

12 A. The features can change the content,  
13 yes.

14 Q. Well -- and that's -- that's what I  
15 wanted to zero in on.

16 So just to take an example, if there is  
17 a picture of a birthday party. Are you with me? A  
18 teenager's birthday party.

19 A. Sure.

20 Q. Okay. A feature of the platform does  
21 not change what is reflected in that picture,  
22 right?

23 MS. COUCH: Objection. Vague.

24 THE WITNESS: I can't speculate  
25 without --

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1 BY MS. JONES:

2 Q. Well, I'm trying to understand if  
3 you're offering the opinion that the features  
4 somehow change what is in the content itself or if  
5 what you're saying is, because someone can like  
6 that picture, it might affect the experience that  
7 an individual teenager has of seeing the content?

8 A. I mean, I think my statement stands in  
9 that these features change those experiences.

10 Q. Sure. The experiences.

11 My question is: Are you offering the  
12 opinion that the features change the content  
13 itself? So takes that picture from the birthday  
14 party and somehow makes it look different than it  
15 looked when it was originally posted?

16 MS. COUCH: Objection. Vague.

17 THE WITNESS: It's hard to say. That's  
18 difficult to speculate on.

19 BY MS. JONES:

20 Q. Well, some -- some of the elements of  
21 social media that you describe in your report are  
22 things like the -- the fact that lots of people can  
23 see it, right?

24 A. The publicness of it is --

25 Q. Yes. Yes.

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1 A. -- one of the -- the things, yes.

2 Q. The publicness of a picture on social  
3 media does not affect the -- what's actually in the  
4 picture, right? It just affects how many people  
5 see the picture?

6 A. The publicness of it increases the  
7 number of people who will see the content.

8 Q. Yes. And I think we're agreeing on  
9 that.

10 But I also want to make sure that we  
11 agree that the fact that social media might be more  
12 public doesn't mean that the picture itself is  
13 somehow different on social media than it might be  
14 if you had taken a picture with a disposable  
15 camera, that it somehow looks different.

16 A. It could look different based on some  
17 of the filters that are used on social media  
18 platforms.

19 Q. Okay. Are there other features of  
20 social media beyond filters that you believe  
21 changes the content in some way?

22 MS. COUCH: Objection. Vague.

23 THE WITNESS: I'm not sure I can answer  
24 that without looking more deeply into it and  
25 referring more to my report to think about that

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1 more.

2 BY MS. JONES:

3 Q. Okay. At the moment, the thing that's  
4 occurring to you, it sounds like, is filters,  
5 though; is that right?

6 A. One of the big things that changes an  
7 image based on a camera photo is filters.

8 Q. Okay.

9 A. One of the -- the main things, yes.

10 Q. Okay. Let me --

11 MS. JONES: Can we go to -- 78? 78A,  
12 please.

13 (TELZER EXHIBIT 12, Video - Healthy  
14 Heels Digital Minds: Brain Development in the Age  
15 of Technology, was marked for identification.)

16 BY MS. JONES:

17 Q. Dr. Telzer, I'm going to hand you what  
18 we've marked as Exhibit Number 12. This is another  
19 portion of your seminar in February of 2025.

20 We have now shared the full video with  
21 your counsel. If you want to see it, they have  
22 access to that. I think it's also on YouTube.

23 MS. JONES: Can -- can we play, please,  
24 78-A, which we've marked as Exhibit Number 12?

25 (Playing video.)

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1 BY MS. JONES:

2 Q. Dr. Telzer, that's you, yes?

3 A. Yes.

4 Q. And, as I mentioned earlier, this is a  
5 portion of a video of a seminar that you did in  
6 February of 2025.

7 I want to start with the same question  
8 I've asked you earlier. When you gave this  
9 presentation in February of 2025, were you aiming  
10 to be truthful about your views?

11 A. What I said in that video was what I  
12 said in that video.

13 Q. Yeah. That was not my -- my -- I know  
14 what you said is what you said.

15 My question was: When you did that  
16 seminar in February of 2025 --

17 A. Yeah.

18 Q. -- were you aiming to be truthful in  
19 the views that you were communicating to the  
20 public?

21 A. I can't speculate on what I was  
22 specifically aiming for. But I said those comments  
23 because of these nuances that we discussed in  
24 detail in this talk.

25 Q. Well, do -- do you ever do

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1 presentations that you know are going to be made  
2 available to your colleagues and to the public and  
3 don't try to be truthful?

4 MS. COUCH: Objection. Excuse me.  
5 Objection. Argumentative.

6 THE WITNESS: I'm always trying to be  
7 nuanced and thorough in my presentations.

8 BY MS. JONES:

9 Q. Sure. And also truthful, right?

10 A. Of course.

11 Q. Okay. And in February of 2025, when  
12 you did this presentation, you were truthful in  
13 articulating your views, recognizing that it was a  
14 longer presentation and you said other things as  
15 well. Is that true?

16 A. Those were the statements I made and  
17 the caveats. Like, we always have caveats in the  
18 broader context of the talk, yes.

19 Q. Yes. And what you said is what you  
20 believed just four months ago, right?

21 A. What I said is the caveats at the  
22 beginning of a talk that we need to sort of set the  
23 stage for. And then we go on to give the causal  
24 information that we have.

25 Q. Okay. And what you specifically said

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1 in February of 2025 is, "There's been a lot of hype  
2 in the news about how social media is creating the  
3 mental health crisis that we are seeing today."

4 Do you remember saying that?

5 A. Uh-huh.

6 Q. You have to say "yes" or "no."

7 A. I remember you showing that to me right  
8 now.

9 Q. Right. Well, my question is: Do you  
10 remember saying that?

11 A. I don't recall saying that. I remember  
12 from what you showed right here.

13 Q. Okay. You have no reason to believe  
14 that what I showed you was somehow an inaccurate --  
15 I know you think it's not complete. But it's not  
16 an inaccurate recording of what you said?

17 A. That is what I said.

18 Q. Okay. And you went on to say, "So, on  
19 the one hand, there is research that does suggest  
20 that social media is related to later depression.  
21 But there's also research, for example, that shows  
22 that more depressed individuals use social media in  
23 different ways."

24 Do you recall saying that?

25 A. Yes.

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1 Q. And was that a true statement when you  
2 said it in February of 2025?

3 A. That is supported by the -- that was --  
4 that statement, yes, was what I said in that talk.

5 Q. Yeah. My question was not was that  
6 what you said. My question was -- let me read the  
7 statement again.

8 "So, on the one hand, there's research  
9 that does suggest that social media is related to  
10 later depression. But there's also research, for  
11 example, that shows that more depressed individuals  
12 use social media in different ways."

13 Was that a true statement when you said  
14 it in February of this year?

15 A. Yes.

16 Q. When you -- and you went on to say, "So  
17 what comes first? The social media or the mental  
18 health?" right?

19 A. Uh-huh.

20 Q. Question mark. Yes?

21 A. Yes.

22 Q. And then you said, "Similarly to this,  
23 correlation does not imply causation," right?

24 A. Yes.

25 Q. And we had a discussion about that

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1 earlier. That statement was true when you said it  
2 in February of 2025, right?

3 A. Yes.

4 Q. That statement is true today, yes?

5 A. Yes.

6 Q. And you went on to say, "So just  
7 because social media may be related to mental  
8 health does not mean that social media necessarily  
9 caused that mental health to develop," right?

10 A. In that context in that clip, I said  
11 that, yes.

12 Q. Yes. And when you said it, was that  
13 true?

14 MS. COUCH: Objection. Incomplete.

15 THE WITNESS: Without the broader  
16 context, it -- we really need the broader context  
17 of the talk for that statement.

18 BY MS. JONES:

19 Q. I promise you we're going to be here  
20 for two days. If your counsel wants to show you  
21 some other part of the video, she can.

22 My question is: When you said, "So  
23 just because social media may be related to mental  
24 health does not mean that social media necessarily  
25 caused that mental health to develop," was that a

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1 true statement when you said it in February of this  
2 year?

3 MS. COUCH: Asked and answered.

4 THE WITNESS: You can't take one  
5 sentence out of an hour-long talk and for that to  
6 equal the totality of an opinion.

7 BY MS. JONES:

8 Q. Is it possible that that statement is  
9 not true or wasn't true when you said it?

10 MS. COUCH: Argumentative.

11 THE WITNESS: That statement without  
12 the broader context does not give the full picture.

13 BY MS. JONES:

14 Q. Okay. And when you -- two months after  
15 this seminar, you signed an expert report in this  
16 litigation, right?

17 A. I don't know the exact timing.

18 Q. Well, you have the report in front of  
19 you. What is the date of your report in the JCCP?

20 A. Sorry. You meant when I signed this?

21 Q. Yes.

22 A. Okay, sure.

23 Q. Well, I'm asking you. Wasn't it just  
24 two months after this seminar in February of 2025  
25 that you signed your written report in the JCCP?

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1 A. It's true that those are the dates.

2 Q. Okay. And when you signed your written  
3 report, you did not include any of these caveats,  
4 for example, that correlation does not imply  
5 causation. That does not appear in your written  
6 report, correct?

7 A. I am not necessarily relying on a  
8 correlational study in my written report. And I'm  
9 relying on much deeper literature that includes  
10 experimental designs and longitudinal designs and  
11 within-person designs and not a singular  
12 correlational analysis.

13 Q. Sure.

14 MS. JONES: And I'm -- with respect,  
15 I'm going to move to strike as nonresponsive.

16 BY MS. JONES:

17 Q. My question was: When you signed your  
18 written report two months after doing this talk in  
19 February of 2025, did you say in your report what I  
20 think you've agreed to today that correlation does  
21 not imply causation?

22 MS. COUCH: Asked and --

23 BY MS. JONES:

24 Q. Did you say that in your report?

25 MS. COUCH: Asked and answered.

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1 THE WITNESS: That specific sentence is  
2 not necessarily in my report.

3 BY MS. JONES:

4 Q. When -- if you come and testify at  
5 trial, will you acknowledge for the jury that  
6 correlation does not imply causation?

7 MS. COUCH: Same objection. Dr. Telzer  
8 doesn't know what she's going to be asked at trial.

9 THE WITNESS: I can't speculate the  
10 future.

11 BY MS. JONES:

12 Q. Well, that's -- none of us can,  
13 unfortunately.

14 My question is: If you were called as  
15 a witness, would you be prepared to acknowledge for  
16 a jury that correlation does not imply causation?

17 MS. COUCH: Asked and answered.

18 THE WITNESS: I can't speculate about  
19 the future.

20 BY MS. JONES:

21 Q. You -- you don't know if you'd be  
22 prepared to acknowledge that before a jury of  
23 folks?

24 MS. COUCH: Argumentative. Asked and  
25 answered.

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MS. JONES: Well, asked many times.

Not answered.

And I'm going to move to strike the last two answers as nonresponsive and coached by counsel.

BY MS. JONES:

Q. My question is: Would you acknowledge that correlation does not imply causation when -- if you are eventually a trial witness?

MS. COUCH: Asked and answered.

THE WITNESS: I can't speculate about the future.

BY MS. JONES:

Q. Okay. You -- you also mentioned there is what you described as the "chicken-or-the-egg issue," yes?

A. Yes.

Q. And specifically, you said, "We have research that suggests that social media is related to later depression, but there's also research that shows that more depressed individuals use social media in different ways," right?

A. I said that.

Q. Okay. And it's -- in that sentence there, "There's research that does suggest that

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social media is related to later depression" --

MS. COUCH: Sorry.

BY MS. JONES:

Q. -- you --

MS. JONES: Are you okay?

MS. COUCH: Yeah. I swallowed wrong. I'm sorry.

MS. JONES: That's okay.

BY MS. JONES:

Q. Let me start again.

In that sentence, you said, "There's research that does suggest that social media is related to later depression," yes? You said that?

A. Yes.

Q. And you did not use the word "cause" there, right?

A. Right.

Q. And you go on to say, "But there's also research that shows that more depressed individuals use social media in different ways," right?

A. Yes.

Q. And the chicken-or-the-egg issue that you raised is sometimes referred to in academic literature as kind of "bidirectionality," yes?

A. No, I would not agree with that.

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Q. Okay. Well, I may -- I may be misusing the terminology. But the idea is that you don't really know if the social media is the reason for the mental health issue or if it's the case that the -- the folks with mental health issues might be more likely to use social media, right?

A. In that specific case with the chicken and the egg, that is what that means.

Q. Okay. And that was true when you said it back in February, right?

A. That statement is what I said and is the case, yes.

Q. And was it -- it's true, yes?

A. It depends on what research you're looking at. If you're looking at a singular cross-sectional correlational study, you cannot necessarily determine from that singular study the chicken or the egg. In -- in that instance, "correlation" may not mean "causation."

But when you do more rigorous experimental designs and within-person analyses and longitudinal designs, we can definitely infer which came first.

Q. Do you -- do you agree with me that cross-sectional studies cannot show causation?

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MS. COUCH: Object to the form. Vague.

THE WITNESS: I would need to see a specific example. In some cases, you can infer causation from a cross-sectional study.

BY MS. JONES:

Q. Is there a cross-sectional study that you're thinking about specifically where you think they were able to find causation?

A. I can't think of a specific example off the top of my head.

Q. Let me ask you to look at your report. Page 111. Do you recall in your written, signed report in this case actually saying that cross-sectional studies cannot be used to determine causality?

A. Can you point me to the sentence?

Q. Sure. On Page 111, in the section entitled "Cross-sectional or population-level analyses."

A. I see it. Yes.

Q. Are you seeing it, Dr. Telzer?

A. Yep. The first sentence, "they cannot be used to determine causality, track changes or developments over time, or determine the direction of relationships between variables."

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1 Q. Okay. And so you -- you actually --  
2 going back to what we were just talking about, you  
3 actually seem to acknowledge in your written report  
4 that because cross-sectional studies only measure  
5 variables at a single point in time, you can't use  
6 them to determine causation, right?

7 MS. COUCH: Objection. Misstates her  
8 report.

9 THE WITNESS: Yeah. I mean, in my  
10 report I am indicating some of the caveats of  
11 cross-sectional designs in that they cannot be used  
12 to determine causality.

13 But if given a specific example,  
14 sometimes, depending on what those variables are,  
15 something may have occurred earlier and something  
16 may have occurred later because of those things,  
17 and we can potentially infer causality.

18 BY MS. JONES:

19 Q. Well, that's not a true cross-sectional  
20 study -- right? -- because that's not just looking  
21 at one point in time?

22 MS. COUCH: Objection. Vague.

23 THE WITNESS: I can't give a specific  
24 example off the top of my head, but some things may  
25 not have been occurring earlier despite it being

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1 measured at one time point.

2 BY MS. JONES:

3 Q. I can't think of an example either.  
4 I'm just going -- I have to rely on what you wrote  
5 in your report.

6 In your report, which is the basis for  
7 your eventual testimony, you said --

8 A. Uh-huh.

9 Q. -- cross-sectional analyses and  
10 cross-sectional studies cannot be used to determine  
11 causality, yes?

12 A. Yep. That statement is correct.

13 Q. And sitting here today, you can't think  
14 for me of an actual study that exists where you  
15 would say, "Actually, that cross-sectional study  
16 establishes causality," right?

17 A. I can't think of a specific example,  
18 and that's why my report relies on a lot of other  
19 much more rigorous methods than cross-sectional  
20 correlational designs.

21 And I use experimental designs where we  
22 can infer causality. We use longitudinal designs  
23 where we can look at things unfolding across  
24 development. And we use ecological momentary  
25 assessment designs that are very intensive

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1 longitudinal designs where we get multiple measures  
2 within a person to see how these things unfold in  
3 real time.

4 MS. JONES: Okay. I'm going to move to  
5 strike everything after, "I can't think of a  
6 specific example."

7 BY MS. JONES:

8 Q. You have referred at different points  
9 today to totality of the studies. Do you recall  
10 that, generally? I've heard it a few times, at  
11 least. Does that sound familiar to you?

12 A. Yes.

13 Q. You're relying on the totality of the  
14 studies, yes?

15 A. Yes.

16 Q. How did you go about determining what  
17 studies will be captured within your totality of  
18 the studies for purposes of concluding that  
19 causation had been established with respect to  
20 social media use and mental health harms in  
21 teenagers?

22 A. I mean, the totality of that research  
23 includes my education, and history of working with  
24 adolescents and teachers and educators, as well as  
25 my thorough literature review of the published

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1 research, as well as my review of the underlying  
2 defendant documents and depositions.

3 So the thoroughness of all of that  
4 helped me to come to my opinions that are in this  
5 report.

6 Q. Okay. I want to focus in on the third  
7 category that you mentioned, your literature  
8 review --

9 A. Sure.

10 Q. -- and the specific studies that you  
11 are relying on.

12 How did you go about deciding what  
13 studies you were going to account for in reaching  
14 your causation opinion versus which ones you  
15 weren't going to focus on?

16 A. I did similar to what I would do in my  
17 sort of academic setting, a literature review of  
18 PubMed and Google Scholar, specifically looking for  
19 research on the topics and outcomes of interest of  
20 social media and the relationship between social  
21 media and function and structural changes in the  
22 adolescent brain as well as how those relate to  
23 adolescents' mental health.

24 Q. Did you use specific search terms?

25 A. I did not use -- well, I had lots of

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1 search terms, broadly speaking, related to that  
2 topic.

3 Q. What does -- I'm -- I'm not sure I know  
4 what that means.

5 Did you use search terms to go about  
6 identifying the literature that you were going to  
7 identify as the studies that, from your point of  
8 view, collectively support causation?

9 A. I looked and searched for research on  
10 social media and structural and functional changes  
11 in the adolescent brain. I reviewed all the papers  
12 that came up for their relevance, as well as looked  
13 within those publications for the references that  
14 they referenced in there to try to understand the  
15 full story of -- of the research.

16 Q. So you -- it sounds -- were those  
17 search terms that you used, "social media" and  
18 "structural and functional changes to the  
19 adolescent brain"?

20 A. Some of many search terms that I used.

21 Q. What other search terms did you use?

22 A. I can't tell you off the top of my  
23 head.

24 Q. Did you document anywhere the specific  
25 search terms that you used to identify the

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1 literature that you were going to point to and say,  
2 "I think this literature collectively proves  
3 causation"?

4 A. Nope.

5 Q. So if we wanted to know how did  
6 Dr. Telzer do her work on that in terms of the  
7 literature, we would not be able to look at  
8 anything in particular?

9 MS. COUCH: Objection. Argumentative.  
10 Vague.

11 THE WITNESS: I describe how I did my  
12 literature search.

13 BY MS. JONES:

14 Q. Well, what you told me was that you  
15 looked for "social media" and "structural and," I  
16 think, "functional changes to the adolescent  
17 brain," and that you didn't remember the rest of  
18 your terms.

19 A. I used a lot of different terms in a  
20 lot of different ways of finding articles as well  
21 as looking within the published articles for other  
22 papers that had been done on that topic. So those  
23 wouldn't necessarily come up with search terms.

24 Q. Sure. But of the search terms, of  
25 which you said you used several, the only two that

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1 you could identify for me are "social media" and  
2 "structural and functional changes to the  
3 adolescent brain," right?

4 A. Among many others, yeah.

5 Q. But could you tell me what the many  
6 others are or you don't remember?

7 A. fMRI, for example. Neural.  
8 Dopaminergic reward systems. But, like I said,  
9 there were handfuls of search terms that I used.

10 Q. Okay. Anything else you recall --

11 A. No.

12 Q. -- sitting here today? And you don't  
13 anywhere written down: These are the search terms  
14 I used?

15 A. No.

16 MS. COUCH: Asked and answered.

17 BY MS. JONES:

18 Q. Did you -- did you do any specific --  
19 did you screen out -- once you kind of gathered  
20 everything together, did you document in one place  
21 everything that had been pulled up by the search  
22 terms that you used?

23 A. No.

24 Q. Okay. Did you go through a process of  
25 looking at everything that had been pulled up and

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1 deciding, I think this is useful or relevant, or,  
2 This is not? Did you kind of sort things in any  
3 way?

4 A. Generally speaking, yeah.

5 Q. Okay. And how did you -- what were  
6 your sorting criteria?

7 A. I didn't have specific sorting  
8 criteria.

9 Q. So, for example, sample size. Did  
10 you -- what did you do about studies that had  
11 smaller sample sizes?

12 A. Smaller sample sizes are just as useful  
13 to read.

14 Q. Did you exclude cross-sectional  
15 studies?

16 A. I looked at cross-sectional studies.

17 Q. But did you -- and -- and I want to be  
18 more precise about my question, and I apologize.

19 My question is: When -- when we're  
20 talking about the literature that you eventually  
21 gathered up and said, "I think this collective body  
22 of literature proves causation," did you have any  
23 mechanism by which you said, "We should" -- "I  
24 shouldn't focus on cross-sectional studies because  
25 those can't prove causality"? That's my question.

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MS. COUCH: Asked and answered.

THE WITNESS: I included cross-sectional studies.

BY MS. JONES:

Q. So you included cross-sectional studies. Did you also include studies that had small sample sizes?

A. I included --

MS. COUCH: Asked and answered.

THE WITNESS: Yes.

BY MS. JONES:

Q. What did you do about studies -- I guess I should ask a threshold question.

Did your research or search exercise pull back any studies that had results that are contrary to your causation opinion, where they found either negative or null results?

A. I can't think of any off the top of my head.

Q. So you didn't identify any -- you know that there's also literature and data that exists that says that, in fact, there's not a relationship between social media use and mental health harms of different sorts, right?

MS. COUCH: Objection. Broad. Vague.

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THE WITNESS: I am aware that there's lots of literature out there. But some of it is less relevant to my opinions here today.

BY MS. JONES:

Q. Yeah. And I guess my question is: Was the literature that showed negative or null results relevant to your opinions at all?

MS. COUCH: Objection. Broad.

THE WITNESS: I don't recall finding any -- let me restate that.

I included every single study that I could identify that included the adolescent brain and its links to social media as broadly as I can make it and did not exclude any that I know of.

BY MS. JONES:

Q. Okay. Did you -- did you find any studies with negative or null results?

A. I can't think of any off the top of my head.

Q. None at all?

A. I can't think of any off the top of my head.

Q. So every study you identified, you're testifying, showed some kind of relationship between social media use and either brain changes

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or adverse mental health outcomes of some kind?

MS. COUCH: Asked and answered.

THE WITNESS: I can't think of any off the top of my head. I included the full list of articles that I considered. It is possible some of those included null or negative associations as you're mentioning.

BY MS. JONES:

Q. You -- you didn't in your written -- the written portion of your actual report, you didn't include any discussion -- and you can correct me if I'm wrong about this.

But you didn't include any discussion of studies that found negative or null results, did you?

A. I included a thorough review of every single study that I could find linking social media to brain development.

Q. Well, sure. My question was: Where there were studies that didn't support that conclusion, did you talk about those in your written report?

MS. COUCH: Objection. Lacks foundation.

THE WITNESS: As far as I know, I did

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not identify any papers looking at social media and brain development that I did not consider in my report.

BY MS. JONES:

Q. Did you include studies that looked at total screen time as opposed to limiting to specific social media platforms?

A. I believe so. I can't think of a specific example.

Q. You don't know one for sure?

A. I believe so. I can't think of a specific example.

Q. Did you include studies that looked at total social media use as opposed to limiting themselves to specific platforms?

A. Can you say that again, please?

Q. Sure. Did you include studies in your review and analysis that looked at total social media use as opposed to limiting themselves to specific platforms?

MS. COUCH: Objection. Vague.

THE WITNESS: I believe so.

BY MS. JONES:

Q. But you don't know?

A. Yeah. Most of the work that we do is

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1 more broadly on social media use and not the  
2 specific platform, if that's what you're asking.

3 Q. Well, I'm -- I'm, actually, mostly  
4 focused on kind of how you went about your process  
5 of including things versus not including things.

6 To the extent that you found studies  
7 that had null or negative results, how did you  
8 account for them in your overall causation  
9 analysis?

10 MS. COUCH: Objection. Vague.

11 THE WITNESS: I don't recall finding  
12 those with null or negative associations in the  
13 type of research that I was looking at that was  
14 central to my opinions here, using more  
15 within-person designs as well as looking at the  
16 effects of social media on brain development.

17 BY MS. JONES:

18 Q. And how did you -- we talked about this  
19 a little bit earlier. How did you account for  
20 studies or papers that described potential  
21 countervailing benefits for adolescents and teens  
22 from social media use?

23 MS. COUCH: Objection. Vague.

24 THE WITNESS: Can you say that again,  
25 please?

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1 BY MS. JONES:

2 Q. Well, I should probably take a step  
3 back and ask. Did you conduct a review to try to  
4 identify papers that might have talked about  
5 benefits of social media use for adolescents or  
6 teens?

7 A. I did not do a thorough review of that  
8 because that was not within the scope of my report.

9 Q. Okay. And -- and your report itself  
10 doesn't talk about the data that exists on that  
11 topic, right?

12 MS. COUCH: Objection. Misstates her  
13 report.

14 THE WITNESS: My report specifically  
15 examines the relationship between social media  
16 function and structure and the adolescent brain.

17 And my assignment was -- nor scope of  
18 work was looking at the benefits of social media.

19 BY MS. JONES:

20 Q. Okay. You have in -- I think we talked  
21 about this earlier. You have in your own work  
22 acknowledged the benefits of social media for some  
23 adolescents and teenagers, yes?

24 A. Yes. In my own work, I look at both  
25 the benefits and the harms of social media use.

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1 Q. When you were doing your review of the  
2 literature, you didn't limit it to only those  
3 studies that looked at social media use as opposed  
4 to total screen time, right?

5 MS. COUCH: Asked and answered.

6 THE WITNESS: I believe there is some  
7 literature on screen time in my report.

8 BY MS. JONES:

9 Q. But you -- when -- when you were doing  
10 your literature collection and review, you did not  
11 focus on studies that were specifically about  
12 social media use, right?

13 MS. COUCH: Asked and answered.

14 THE WITNESS: I believe that I do have  
15 some stuff more broadly in there but all relevant  
16 to our understanding of social media use.

17 BY MS. JONES:

18 Q. And just to be clear, when we say "more  
19 broadly," we're talking about studies that might be  
20 talking about other forms of media beyond social  
21 media, yes?

22 MS. COUCH: Objection. Vague.

23 THE WITNESS: I'm not sure. I focused  
24 on social media use.

25 BY MS. JONES:

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1 Q. But your review included studies that  
2 might have been total screen time?

3 MS. COUCH: Asked and answered.

4 THE WITNESS: There is stuff that I  
5 considered on screen time.

6 BY MS. JONES:

7 Q. Okay. We talked a little bit earlier  
8 about problematic use and whether social media use  
9 is problematic for all adolescents or teenagers.

10 You -- you would acknowledge that  
11 social media use does not for all adolescents and  
12 teenagers cause depression, right?

13 MS. COUCH: Objection. Vague.

14 THE WITNESS: It's hard to necessarily  
15 answer so broadly about all adolescents.

16 I will say within our work, looking at  
17 within-person analyses, in the moments that  
18 adolescents use social media, within a person,  
19 their depression goes up; suggesting that no matter  
20 who you are, your depression and depressed affect  
21 is being affected by social media.

22 BY MS. JONES:

23 Q. What do you mean by "their depression  
24 goes up"?

25 A. We're doing within-person analyses. So

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1 we are pinging adolescents three times a day over  
2 14 days, which gives us dozens of data points.

3 And with that, you have a within-person  
4 analysis. So you can say, compared to this  
5 person's average depression, their depressed levels  
6 go up in the moments that they use social media.

7 Q. And in that circumstance, are we  
8 talking about adolescents who are already  
9 depressed?

10 A. This controls -- it's not a  
11 between-person analysis. So it controls for  
12 anybody's depressed level, because it's looking at  
13 an individual relative to themselves.

14 It doesn't matter whether you started  
15 off as a little depressed or more depressed. Your  
16 depression goes up relative to your average.

17 Q. And I want to come back to my original  
18 question. But in terms of the dataset that you're  
19 relying on for this notion about depression goes up  
20 at the moment they're exposed to social media, how  
21 many participants are we talking about?

22 A. I don't recall the sample size.

23 Q. We're talking about a few hundred,  
24 right?

25 A. Uh-huh.

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1 Q. You have to say "yes" or "no."

2 A. Sorry. Yes.

3 Q. Okay. And I think it's -- it's  
4 300-and-something; is that right?

5 A. I can't --

6 Q. Or am I misremembering that?

7 A. I can't recall off the top of my head.  
8 I don't -- we would need to look at the  
9 publication.

10 Q. Okay.

11 A. Yeah.

12 Q. But we can agree that it's a few  
13 hundred, right?

14 A. Yep. Sure.

15 Q. Let me go back to my question.

16 You are not offering the opinion that  
17 for every teenager/adolescent who uses social media  
18 that that will cause depression in that teenager,  
19 right?

20 MS. COUCH: Asked and answered.

21 THE WITNESS: I'm saying that based on  
22 research, looking at these within-person analyses,  
23 no matter who you are, your depression goes up in  
24 the moments that you use social media.

25 BY MS. JONES:

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1 Q. What if you didn't have depression to  
2 begin with?

3 A. It doesn't matter your level of  
4 depression. Your depressed affect goes up in the  
5 moments that you're using social media relative to  
6 your average.

7 Q. And that's a conclusion based on this  
8 sample size of roughly 300 -- not -- I'm sorry -- a  
9 few hundred adolescents?

10 A. This is based on not only one of the  
11 papers coming out of my lab, but there are other,  
12 what we call, "EMA studies" looking at similar  
13 constructs.

14 MS. JONES: Yeah. Let me -- let me,  
15 again, respectfully, move to strike as  
16 nonresponsive. Because I think you're answering  
17 some different question.

18 BY MS. JONES:

19 Q. My question is: Are you offering the  
20 opinion that every teenager who uses social media  
21 eventually develops depression?

22 MS. COUCH: Objection. Vague. Asked  
23 and answered.

24 THE WITNESS: I did not say that. I  
25 said that, within a person in the moments that

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1 you're using social media -- an adolescent is using  
2 social media, their depressed affect goes up in  
3 those moments.

4 BY MS. JONES:

5 Q. Sure. And I didn't think you had said  
6 that, but I want to make sure that I'm clear.

7 You are not offering an opinion that  
8 for every teenager who uses social media, that  
9 teenager is going to develop depression at some  
10 point?

11 MS. COUCH: Asked and answered.

12 BY MS. JONES:

13 Q. That's not your opinion, right?

14 A. My opinion is that, within a person,  
15 one's depression goes up when they use social  
16 media.

17 Q. I'm not asking you about that.

18 MS. JONES: I'm going to move to strike  
19 as nonresponsive yet again.

20 BY MS. JONES:

21 Q. My question is: You are not offering  
22 the opinion that every teenager who uses social  
23 media eventually is going to develop depression?

24 MS. COUCH: Objection. Vague. Asked  
25 and answered.

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1 THE WITNESS: Yeah. My opinion is  
2 largely based on these within-person designs where  
3 we can look within a person with high confidence  
4 where we're not necessarily comparing a depressed  
5 to a nondepressed person.

6 BY MS. JONES:

7 Q. And when you -- when you say  
8 "depressed" -- "depression goes up," you mean how  
9 someone is feeling at the time, not necessarily  
10 that someone is getting a -- kind of a formal  
11 clinical diagnosis of depression, right?

12 A. We're looking at their depressed  
13 affect.

14 Q. Right. And that is not the same thing  
15 as someone being formally diagnosed with  
16 depression, right?

17 A. It is often correlated. Higher  
18 depressed affect is associated or correlated with  
19 clinical diagnoses of depression.

20 But, no, in these -- these specific  
21 studies, I'm not talking about clinical levels of  
22 depression.

23 Q. Right.

24 And your opinion about the depression  
25 going up, that's -- depressed affect going up, is

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1 that based on your forthcoming paper --

2 MS. COUCH: Objection.

3 BY MS. JONES:

4 Q. -- that data?

5 MS. COUCH: Misstates her prior  
6 testimony.

7 THE WITNESS: I don't know what  
8 forthcoming paper you mean. Sorry.

9 BY MS. JONES:

10 Q. With Nesi and Burnell.

11 MS. COUCH: Same objection.

12 THE WITNESS: I don't recall -- I don't  
13 think it's from that paper.

14 BY MS. JONES:

15 Q. Okay. Let me ask you the same question  
16 with respect to anxiety. Do you have the opinion  
17 that every teenager who uses social media will  
18 eventually develop anxiety?

19 MS. COUCH: Objection. Vague.

20 THE WITNESS: I think that this is sort  
21 of out of the scope of where my opinions go. I'm  
22 mostly relying on these within-person effects,  
23 where we can say -- within a person controlling for  
24 all components of their life, their family life,  
25 their school life, their own levels of depression

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1 or anxiety, we can say that using social media is  
2 related to increases in those symptoms for those  
3 adolescents.

4 BY MS. JONES:

5 Q. Did your analysis actually look at  
6 anxiety or just --

7 A. I don't recall if my specific analysis  
8 did. I'd have to go back and look through my  
9 papers. But the broader literatures looked at  
10 anxiety, yes.

11 Q. Yeah. And I'm -- because you keep  
12 raising this, I just want to make sure I'm clear on  
13 what your data actually show.

14 Your data, I think you said, was  
15 focused on depressive affect, yes?

16 MS. COUCH: Objection. Misstates her  
17 testimony.

18 THE WITNESS: The specifics that I was  
19 talking about were related to how social media is  
20 related to depressed affect.

21 BY MS. JONES:

22 Q. Yes. It's not about anxiety?  
23 You're -- were -- you were not evaluating people's  
24 reported feeling of anxiety, right?

25 A. We have looked at anxiety.

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1 Q. I'm asking about the specific dataset  
2 that you keep referring to.

3 A. We have --

4 MS. COUCH: Object --

5 THE WITNESS: I'm sorry.

6 MS. COUCH: Sorry.

7 Objection. Vague.

8 THE WITNESS: We have anxiety.

9 BY MS. JONES:

10 Q. I don't know what that means. What do  
11 you mean, "We have anxiety"?

12 A. We measure anxiety. We measure anxious  
13 symptomology.

14 Q. How?

15 A. Similar to depressed affect. In our  
16 EMAs, we're measuring multiple times a day across  
17 two weeks.

18 Q. Okay. What else are you measuring?  
19 Depression, anxiety. What else?

20 A. I'd have to look back at the  
21 publications. We're measuring lots of things.

22 Q. Okay. Go back to Page 6 of your  
23 report.

24 You indicate in your report at Page 6,  
25 at the top of the page: heavy social media use

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1 changes the development of the adolescent brain,  
2 altering it from what would have been considered  
3 typical prior to the advent of social media. Yes?

4 A. Yes.

5 Q. You don't, if I'm reading your report  
6 correctly, identify or specify what "heavy" means  
7 in that context, right?

8 A. I don't define it in this sentence.

9 Q. Do you -- tell me, what are you  
10 defining as "heavy social media use" for purposes  
11 of this opinion?

12 A. I think this comes from diverse studies  
13 and publications, ranging from habitually checking  
14 social media to more problematic forms of social  
15 media use. It's interfering with their daily  
16 lives. I guess I'll leave it at that.

17 Q. Okay. So tell me, what is that  
18 threshold that gets you into heavy social media use  
19 from -- in your perspective?

20 MS. COUCH: Asked and answered.

21 THE WITNESS: We are looking at  
22 variability in their social media use related to  
23 things like habitually checking their social media  
24 and higher levels of problematic social media use  
25 that's interfering with their daily lives.

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1 BY MS. JONES:

2 Q. Are -- are you -- are you defining  
3 "heavy use" by time?

4 A. We are defining it using sort of  
5 diverse perspectives here. There's no one single  
6 threshold. We're not necessarily looking at time.  
7 We're more so looking at the ways in which it is  
8 used in a more problematic way.

9 Q. Okay. So for purposes of your opinion  
10 on heavy social media use causing changes in the  
11 development of the adolescent brain, you're not  
12 defining "heavy" by reference to time?

13 A. I'm not specifically referring to time.

14 Q. And when you say "specifically," it  
15 makes me wonder if there's something else.

16 Are you -- when you describe "heavy  
17 social media use," are you in any way tying that to  
18 some amount of time?

19 A. I'm not specifically tying that to any  
20 amount of time per se. I'm mostly referring to the  
21 use of habitually checking and engaging in more  
22 problematic social media behaviors that's  
23 interfering with their daily lives.

24 Q. Okay. So tell me what your opinion is  
25 on what "habitual checking" means.

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1 A. That comes from one of our publications  
2 where we ask adolescents how frequently they're  
3 checking their social media accounts.

4 Q. Was that the Maza paper?

5 A. Yeah.

6 Q. In 2023?

7 A. Yeah.

8 (TELZER EXHIBIT 13, JAMA Pediatrics -  
9 Association of Habitual Checking Behaviors on  
10 Social Media with Longitudinal Functional Brain  
11 Development, was marked for identification.)

12 BY MS. JONES:

13 Q. Why don't we look at that.

14 MS. JONES: Which is going to be  
15 Tab 44, I think.

16 BY MS. JONES:

17 Q. Is -- are there -- is there anything  
18 else you're relying on in terms of your opinions  
19 with respect to habitual checking being an  
20 indicator of heavy social media use?

21 A. That is one of the domains of heavy  
22 social media use.

23 Q. Yeah. And I'm -- I'm asking you --  
24 when I asked you, like, "Okay, you're not focused  
25 on time. So what are you focused on?"

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1 And you said, "Habitual checking and,"  
2 you said, "other forms of problematic use." And  
3 for the moment, I'm just focused on habitual  
4 checking.

5 A. Okay.

6 Q. And I asked you, "What do you mean by  
7 habitual checking," yes?

8 A. Yes.

9 Q. And you said, "Well, we've talked about  
10 that in connection with one of our papers," yes?

11 A. Yes.

12 Q. Is -- I want to just -- just to  
13 understand. Is there anything beyond your paper  
14 from 2023, which we will look at, that you're  
15 relying on in terms of establishing what "habitual  
16 checking" means?

17 A. That is one of many aspects of heavy  
18 use that I'm talking about. This is one example of  
19 habitual checking.

20 Q. No, I understand. I understand.

21 I'm asking you, are there other pieces  
22 of literature that you are relying on to support  
23 what you think "habitual checking" means beyond  
24 your paper in 2023?

25 And if it's just your paper, that's

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1 fine. I'm just trying to understand.

2 A. I mean, there's a broad literature  
3 looking at habitual social media behaviors, and  
4 this is one example of those.

5 Q. Okay. And I think what I heard you say  
6 earlier is that there is no defined amount of time  
7 that somehow automatically equates to heavy social  
8 media use; is that right?

9 A. I think that it's difficult to  
10 establish a specific quantity of time that  
11 establishes it as heavy.

12 I think it is pretty clear that  
13 something like eight hours a day is heavy use. But  
14 lower hours of use could be potentially problematic  
15 as well.

16 Q. And would it matter what -- how the  
17 adolescent or teen is actually spending that time?

18 A. I think that --

19 MS. COUCH: Objection. Vague.

20 THE WITNESS: I think that the reason  
21 time metrics can be a little bit more challenging  
22 is because they don't take into consideration all  
23 of the features of the social media that may make  
24 that experience more or less unhealthy for an  
25 adolescent.

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1 BY MS. JONES:

2 Q. And if I'm understanding your testimony  
3 and also your written report, you have not  
4 identified any time threshold above which you would  
5 say, "This is heavy social media use that's going  
6 to lead to a brain" -- "a change in brain  
7 development," right? You've not identified  
8 something specific?

9 And that's okay if you haven't. I just  
10 want to make sure I understand.

11 A. If you're asking about specific time?

12 Q. Yes.

13 A. We don't necessarily quantify an amount  
14 of time or some kind of threshold here.

15 Q. Okay. And that's the case in your  
16 written report. But it's also the case in your  
17 writings more generally that you've not identified  
18 some threshold where you'd say, "Above this is  
19 heavy and it's going to lead to brain changes,"  
20 right?

21 MS. COUCH: Objection. Compound and  
22 vague.

23 THE WITNESS: I'm not -- I'm not sure  
24 exactly. It's possible that we've quantified time  
25 a little bit more than what you're saying.

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1 BY MS. JONES:

2 Q. Can you -- if you -- if you have, can  
3 you recall it?

4 I'm just asking if --

5 A. Yeah.

6 Q. I -- I -- you know better what you've  
7 said than I do.

8 Have -- do you have any recollection of  
9 ever documenting somewhere at this amount of time,  
10 heavy and is going to lead to brain change; and  
11 below that, maybe it's less likely?

12 MS. COUCH: Objection.

13 BY MS. JONES:

14 Q. Do you have any recollection of doing  
15 that?

16 MS. COUCH: Objection. Compound.

17 Vague.

18 THE WITNESS: Yeah, I think that it's  
19 hard to answer that question because we look at  
20 individual differences across a continuum.

21 Sometimes for statistical purposes we  
22 might sort of create groups at a threshold, but  
23 everything is along a continuum.

24 BY MS. JONES:

25 Q. Okay. And can I ask you before we look

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1 at your paper specifically.

2 In terms of what qualifies as heavy in  
3 your framing of your opinion, heavy social media  
4 use that can change the development of the  
5 adolescent brain, does it -- does that vary by  
6 individual teenager?

7 A. Does heavy vary by individual teenager?

8 Q. Yes.

9 MS. COUCH: Objection. Vague.

10 THE WITNESS: This is -- I'm getting a  
11 little caught up on the semantics here. I'm sorry.  
12 BY MS. JONES:

13 Q. Which part are you caught up on?

14 A. I'm just confused by -- it's  
15 complicating what I think of as a pretty  
16 straightforward metric.

17 Q. Well, in your report, you said: Heavy  
18 social media use changes the development of the  
19 adolescent brain, right?

20 A. Yes.

21 Q. That's your report?

22 A. Yep.

23 Q. Does what qualifies as "heavy social  
24 media use that can change the development of the  
25 adolescent brain," does that vary by individual

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1 teenager?

2 A. Does that vary by individual teenager.  
3 I don't understand what you mean by "does that vary  
4 by individual teenager."

5 Q. The extent to which heavy social media  
6 use would lead to a change in the development of  
7 the brain.

8 MS. COUCH: Objection. Vague.

9 THE WITNESS: I'm sorry. I'm not  
10 understanding.

11 BY MS. JONES:

12 Q. Okay. What about: Does it vary by  
13 what a teenager is doing on social media?

14 MS. COUCH: Objection. Vague.

15 THE WITNESS: I think there's two  
16 separate things here. There's problematic use and  
17 there's different ways in which problematic use  
18 manifests. And it could look different in  
19 different adolescents.

20 And that differs from me saying in an  
21 opinion that, based on all of this literature, I  
22 believe that heavy social media use is changing the  
23 developing brain.

24 BY MS. JONES:

25 Q. Would it matter -- could it vary based

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1 on what an individual teenager is actually seeing  
2 in terms of content on social media?

3 MS. COUCH: Objection. Vague.

4 THE WITNESS: I -- again, I think  
5 there's two separate things here. There is  
6 variance across people and the exposures and  
7 experiences that they're having, and that is a  
8 different thing than me reviewing the totality of  
9 the research and coming to the conclusion that  
10 heavy social media use is altering the -- the  
11 brain.

12 MS. JONES: Yeah, I'm going to move to  
13 strike as nonresponsive because I don't think that  
14 was an answer to my question.

15 BY MS. JONES:

16 Q. My question was: When you're talking  
17 about your opinion that heavy social media use  
18 changes the development of the adolescent brain,  
19 does it matter what content the adolescent or  
20 teenager is actually getting while using social  
21 media?

22 A. Sure. That -- thank you for that more  
23 straightforward question.

24 Q. Sure.

25 A. I can answer that.

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1 I think that my opinions and the  
2 research that I have relied upon is content  
3 agnostic.

4 What we're really more interested is  
5 the problematic ways adolescents are engaging with  
6 social media and the way those features are  
7 creating a more harmful experience for adolescents.

8 And this is largely content agnostic.  
9 So I'm not relying that opinion on the content that  
10 they're being exposed to.

11 Q. Have you specifically looked at that in  
12 connection with your research?

13 A. Have I specifically looked at what?

14 Q. I -- I should have said -- been more  
15 clear.

16 Have you specifically evaluated not  
17 just the fact that a teenager and adolescent was  
18 using social media, but also what the teenager or  
19 adolescent was actually seeing in terms of content  
20 on social media? Have you looked at that to see  
21 whether it would vary?

22 MS. COUCH: Objection. Vague.

23 THE WITNESS: I don't recall looking at  
24 specific content because we design our studies to  
25 be content agnostic and to look more at these

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1 features that I am relying upon to discuss some of  
2 these harms of social media.

3 BY MS. JONES:

4 Q. Do you have a recollection of saying --  
5 and, in fairness, I think this was before you were  
6 engaged with this litigation.

7 But do you have a recollection of  
8 saying, "It's not necessarily about the overall  
9 time but the content they're exposed to"?

10 A. I may have said that.

11 Q. Okay. Does that ring true to you?

12 MS. COUCH: Objection. Vague.

13 THE WITNESS: Does that ring true to me  
14 that I -- I said that?

15 BY MS. JONES:

16 Q. No. Does that statement seem right to  
17 you?

18 A. What do you mean by "does that  
19 statement seem right" to me?

20 Q. The statement that I just read you.

21 Why don't we show you the video.

22 MS. JONES: Can we go to 77?

23 MS. COUCH: Is this an existing exhibit  
24 or a new one?

25 MS. JONES: It'll be new.

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(TELZER EXHIBIT 14, Video - Alan Hu Foundation Webinar, was marked for identification.)

MS. COUCH: And this is Exhibit 13?

MS. JONES: 14.

MS. COUCH: 14.

MS. JONES: What number did we put on that one? I don't remember.

THE WITNESS: 14.

MS. JONES: 14. Okay.

(Playing video.)

MS. JONES: Can we pause that for a second, please? Thank you.

BY MS. JONES:

Q. Dr. Telzer, you have in front of you what we have marked as Exhibit Number 14 to your deposition.

We will make the full thing available to your counsel if they want to review the entire thing, but we've just shown an excerpt because we are limited in time here.

I will represent to you that this is a webinar that you participated in in May of 2023. And recognizing that was two years ago, do you have any memory of participating in a webinar in 2023?

A. Yes.

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Q. Okay.

MS. JONES: Can we go ahead and play that, please.

(Playing video.)

BY MS. JONES:

Q. Dr. Telzer, that's you, yes?

A. Correct.

Q. Do you recall doing that webinar in May of 2023?

A. Yep.

Q. And just to refer back to your paper of February of 2023, the Maza paper, my -- my impression was that your paper was published, and then you did some amount of press and discussions about the findings in your paper; is that right?

A. This is not press, but --

Q. Well, I don't -- I'm not trying to diminish what you did by saying "press." But you were having some conversations publicly about the findings from your paper; is that right?

A. This webinar was unrelated to that, but our findings were included in that webinar.

Q. Okay. Okay. Fine.

And one of the things that you specifically said, as you probably heard, was that

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it's not necessarily about the overall time, but the content that they're exposed to, right?

A. I think you're taking that slightly out of context. This was the Q and A session where I think somebody -- although, I -- I'm recalling from my memory, since you played one tiny clip at the 59 minute of a 60-plus-minute webinar.

I think what was happening is, they were asking for a time limit that might be appropriate, and I was responding that we can't necessarily give a time limit --

Q. Sure.

A. -- which --

Q. I heard that, too.

A. Uh-huh.

Q. What I also heard you say was that the content that an adolescent or teen is exposed to also matters.

A. The content can matter, certainly. But I think that the broader important thing is what I now know from doing a lot more research on this topic, as well as seeing a lot of the underlying documents, understanding these features in a lot more detail now than I did a few years ago, that it really is about these features of social media that

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are -- that are making what that content was even more harmful.

Q. And you -- when you were participating in this webinar, you -- it sounds like somebody might have asked you a question, "Is there a cutoff?" Right?

A. I think that's what they were asking.

Q. All right. And I assume that even though it was the Q and A portion of the webinar, you aimed to be accurate and truthful in reciting what your views are -- or were at the time?

A. Yes, I was responding to their questions.

Q. Okay. Are you testifying that, sitting here today, you no longer think that the content matters?

MS. COUCH: Misstates her testimony.

THE WITNESS: I am not saying that. I'm saying that, a few years ago, I thought -- and I mentioned the content was one component that could be harmful, and today, knowing a lot more about these features, that I now have the opinion that that is exponentially making the harms of social media worse.

BY MS. JONES:

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Q. But the content still matters sitting here today in June of 2025?

MS. COUCH: Asked and answered.

THE WITNESS: I think that content is one small piece of the puzzle amongst much larger concerns and risks associated with the features of these platforms.

BY MS. JONES:

Q. When you say the features are making the content exponentially more harmful, are you just referring back to the features of social media that you talked about earlier?

A. I'd like to give a specific example from my report, if I may.

Q. Well, actually, I just want you to focus on my question because we're limited in time.

My question is: When you refer to the features of social media making content exponentially more harmful, are you referring to the features of social media that we talked about earlier?

MS. COUCH: Objection.

BY MS. JONES:

Q. And I'm --

MS. COUCH: Vague.

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MS. JONES: I'm sorry. Go ahead.

MS. COUCH: Objection. Vague. Can't limit her answer. For the record, we have seven hours left.

THE WITNESS: Yeah, I think that I'd like to give a specific example because it's a lot easier --

BY MS. JONES:

Q. Right. I -- but I --

A. Excuse me.

Q. Doctor -- excuse me, Dr. Telzer.

A. You interrupted me.

Q. I don't mean to be rude, but you -- you actually don't get to volunteer what you'd like to say. I actually just want you to focus on my question, if you wouldn't mind.

My question was: When you say that the features are making the content exponentially more harmful, are you referring to the features that we talked about already earlier in the deposition?

MS. COUCH: Objection. Vague.

If you can answer without referring, you can. If you can't, you're entitled to look at your report to answer a question.

THE WITNESS: Yes, I am discussing

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those features. And as an example, the algorithms in particular are changing the experience of social media.

So, for example, with toxic eating behaviors, adolescents with eating disorders are 4,000 times more likely to be fed these videos compared to those without an eating disorder.

MS. JONES: Okay. I'm going to move to strike everything after, "Yes, I am discussing those features."

BY MS. JONES:

Q. Under your theory related to potential changes in the brain resulting from heavy social media use, is it your opinion that those changes are always negative versus positive?

MS. COUCH: Objection. Vague.

THE WITNESS: I think it's a nuanced answer. We know that social media is fundamentally changing the way the brain is developing. We need long-term research in some ways to be able to track what those effects mean into longer-term development, as I've discussed.

BY MS. JONES:

Q. Oh, was that the end of your answer?

A. I was --

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Q. I would accept that as the end of your answer. I just didn't want to interrupt --

A. Yeah, I was --

Q. -- you if you were going to say something else.

A. -- just going back to refer that the -- the broader opinion is meant to really underscore that the brain is develop -- that the social media experiences are changing the development of the brain. I think your question was related to whether those changes in the brain are good or bad.

Q. Yes. That was my question, is whether you have an opinion on that.

A. I think --

Q. Are they always good, always bad?

A. I think we can't necessarily say that something is always good or always bad when we're talking about these individual differences and how the changes -- and how the brain is changing developmentally.

With the broader -- with the broader literature to rely upon and some of our other work showing that changes in the brain predict -- predict which adolescents are going to develop problematic social media use, I think we can be

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1 pretty confident that these changes in the brain  
2 are bad.

3 Q. Well, when you say, "we can be pretty  
4 confident that these changes in the brain are bad,"  
5 my question was not that.

6 My question was: Do we know whether  
7 it's always bad versus sometimes good?

8 MS. COUCH: Asked and answered.

9 THE WITNESS: I think your question is  
10 too broad and general, and we need a specific  
11 example to say.

12 But I've shown that adolescents who  
13 habitually use social media show that their brain  
14 is changing, becoming more hypersensitive to their  
15 peer environments. I've also shown that  
16 developmental changes in the brain predict  
17 problematic social media use.

18 And so these are just two examples that  
19 help us to understand the bigger picture, that the  
20 brain is changing in response to social media. And  
21 the brain changes can also help us understand  
22 vulnerabilities for developing problematic social  
23 media use.

24 MS. JONES: Okay. I'm going to move to  
25 strike as nonresponsive.

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1 BY MS. JONES:

2 Q. But the point you've made about "I've  
3 shown that adolescents who habitually use social  
4 media show that their brain is changing," that's  
5 your -- that's the Maza paper from 2023?

6 MS. COUCH: Objection. Misstates her  
7 report and opinion.

8 THE WITNESS: That's one example of a  
9 paper that uses longitudinal methods to look at  
10 brain changes.

11 BY MS. JONES:

12 Q. Okay. Let's look at that. We marked  
13 it as Exhibit Number 13, I think.

14 This is -- Exhibit Number 13,  
15 Dr. Telzer, is your -- a paper that you co-authored  
16 with several other folks and published in the early  
17 part of 2023 in "JAMA Pediatrics"; is that right?

18 A. Correct.

19 Q. And the title of the article is  
20 "Association of Habitual Checking Behaviors on  
21 Social Media With Longitudinal Functional Brain  
22 Development," right?

23 A. Yes.

24 Q. And I'm not going to march you through  
25 every element of your paper. Because you've

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1 referred to it in a couple of places, I just wanted  
2 to ask you about a couple of points.

3 Let's turn to the second page, if you  
4 wouldn't mind, and look in the first column.

5 A. Okay.

6 Q. And I'm going to ask you to look down  
7 at the paragraph that begins with "The current  
8 study." Do you see that? Towards the bottom --

9 A. Yeah.

10 Q. -- on the left-hand side.

11 It says: The current study aimed to  
12 examine whether social media use is associated with  
13 longitudinal changes in functional brain  
14 development across adolescence, a developmental  
15 period characterized by peak social media use and  
16 heightened neural sensitivity to social feedback  
17 from peers. Right?

18 A. Yes.

19 Q. And then a little further down -- well,  
20 and you had a hypothesis, right?

21 A. Yes.

22 Q. You hypothesized that if teens more  
23 regularly checked social media, they would become  
24 increasingly hypersensitive to social feedback  
25 anticipation, and that would result in longitudinal

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1 increases in neural activation, right?

2 A. Yes.

3 Q. And that's another way of saying -- I'm  
4 going to say this in my simplistic way -- that  
5 if -- your theory was if you had adolescents who  
6 check their social media a good bit, that they will  
7 eventually develop processes that will lead to  
8 changes in the brain.

9 Is that the nutshell version?

10 MS. COUCH: Objection. Vague.

11 THE WITNESS: I'm not sure that that  
12 nutshell is -- can you say that again?

13 BY MS. JONES:

14 Q. Sure. You have -- your theory was that  
15 for adolescents who checked their social media  
16 habitually --

17 A. Uh-huh.

18 Q. -- they would become hypersensitive to  
19 social feedback anticipation, right?

20 A. Yep. That's -- that's what we said in  
21 the paper.

22 Q. And "social feedback anticipation,"  
23 what is the nutshell version of that, just so we're  
24 on the same page?

25 A. It's the idea of -- of anticipating

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1 feedback. Sorry. That's repeating back the same  
2 words.

3 Q. The reason I asked you to define it,  
4 yeah.

5 A. Yeah. It is the idea that you are  
6 anticipating you will either get, using social  
7 media as an example, positive feedback in the form  
8 of likes, for example, from your peers.

9 Q. And then what your -- if I understand  
10 the theory, the theory was, over time, that would  
11 lead to increases in what's described here as  
12 "neural activation," right?

13 A. Yes.

14 Q. In certain areas of the brain, right?

15 A. Yes.

16 Q. Including certain areas that are  
17 associated with motivational, affective salience  
18 and cognitive control, right?

19 A. Correct.

20 Q. And you also had a theory that if you  
21 didn't check as much, over time you would see  
22 decreases in the activation in those same parts of  
23 the brain. Is that roughly correct?

24 A. That's what we wrote here.

25 Q. Okay. And then you said: Given the

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1 limited research exploring longitudinal neural  
2 activation in relation to social media behaviors --

3 A. Uh-huh.

4 Q. -- we conducted exploratory whole-brain  
5 analyses to determine which brain regions showed  
6 the greatest differences in neural activation  
7 longitudinally.

8 To our knowledge, results from this  
9 study would provide the first insight into how  
10 habitual social media behaviors may be altering  
11 adolescent brain development. Yes?

12 A. Uh-huh. Yes.

13 Q. You have to say "yes" or "no."

14 Was that a true statement? Were there  
15 earlier studies prior to this one that was  
16 published in 2023 on this specific issue?

17 A. To our knowledge, it was the first.

18 Q. Okay. Have there been others since?

19 A. Other what?

20 Q. Other studies that look specifically at  
21 this question of how habitual social media  
22 behaviors may alter adolescent brain development.

23 A. There probably have been. I can't  
24 think of -- I mean, there's a large amount of  
25 literature coming out using longitudinal techniques

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1 to look at brain development related to social  
2 media.

3 Q. I'm not sure if that's a "yes" or a  
4 "no."

5 Are -- can you think -- are there other  
6 studies you're thinking of that looked at this same  
7 question, or you're not sure?

8 A. This specific question, not  
9 necessarily. But the broader literature has looked  
10 at -- there's been more studies coming out looking  
11 at social media and brain development.

12 Q. Okay. Let's go to Page 163 in the  
13 bottom right-hand corner, the "Discussion" section.  
14 And this simply lays out in more general terms the  
15 findings from the study, yes?

16 A. I think it summarizes some of the  
17 findings.

18 Q. Okay. "Summarizes" -- I can accept  
19 that word.

20 And you and your co-authors reported  
21 that: Adolescents who engaged in high (habitual)  
22 checking behaviors showed distinct neural  
23 trajectories when anticipating social feedback  
24 compared with those who engaged in moderate or low  
25 or (nonhabitual) checking behaviors, suggesting

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1 that habitual social media checking early in  
2 adolescence is associated with divergent brain  
3 development over time. Yes?

4 A. Yes.

5 Q. Then if you go to Page 165, you have a  
6 section there entitled -- that starts with: Our  
7 findings on the bottom left-hand side.

8 A. Uh-huh.

9 Q. You have to say "yes" or "no."

10 A. Yes. Sorry.

11 Q. It says: Our findings suggest that  
12 checking behaviors on social media in early  
13 adolescence may tune the brain's sensitivity to  
14 potential social rewards and punishments. Yes?

15 A. Yes.

16 Q. It says: Whereas individuals with  
17 habitual checking behaviors showed initial  
18 hypoactivation but increasing sensitivity to  
19 potential social cues over time, those with  
20 nonhabitual checking behaviors showed initial  
21 hyperactivation and decreasing sensitivity over  
22 time. Yes?

23 A. Yes.

24 Q. And then, in the next column, you and  
25 your co-authors report: This theory argues that

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1 repeated exposure to social reward downregulates  
2 dopamine receptors and production, which results in  
3 decreased sensitivity of reward circuits. Yes?

4 A. Yes.

5 Q. Now, I have one question I wanted to  
6 ask you. In this paper -- published in January of  
7 2023, there was a correction in February of 2023 --  
8 there is no place in this paper where you or  
9 your -- you and your co-authors say: Heavy social  
10 media use changes the development of the adolescent  
11 brain, altering it from what would have been  
12 considered typical prior to the advent of social  
13 media?

14 MS. COUCH: Objection. Misstates the  
15 paper.

16 THE WITNESS: That statement that you  
17 read is not in this article.

18 BY MS. JONES:

19 Q. And, in fact, you have a Limitation  
20 section -- you have a Limitation section in your  
21 study. And we talked earlier about study  
22 limitations, right?

23 A. Briefly, we talked about study  
24 limitations, yeah.

25 Q. Okay. And this is another paper on

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1 which you were a co-author where you all reported  
2 on limitations of the -- the study, yes?

3 A. Correct.

4 Q. And that's -- this statement of  
5 limitations, that's a truthful account of you and  
6 your co-authors' views on the limits of your study,  
7 yes?

8 MS. COUCH: Objection. Vague.

9 THE WITNESS: We include limitations  
10 about our studies in all empirical papers like  
11 this --

12 BY MS. JONES:

13 Q. Sure.

14 A. Indicating what potential limitations  
15 could be.

16 Q. Sorry to interrupt you.

17 My question was: Is this an accurate  
18 account of you and your co-authors' views on the  
19 limitations of the study?

20 A. This is what we represented in this  
21 article as the limitations --

22 Q. Okay.

23 A. -- at the time, yeah.

24 Q. And they're right. I mean, from  
25 you-all's perspective, these are the limitations

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1 that exist, yes?

2 A. These are the limitations.

3 Q. And it says: Notably, because  
4 differences in neural trajectories already existed  
5 between participants with habitual and nonhabitual  
6 checking behaviors at the start of the study, it is  
7 difficult to determine whether social media use  
8 prior to data collection caused these distinct  
9 neural trajectories or pre-existing differences in  
10 neural activation placed some youth at risk for  
11 more habitual checking behaviors. Yes?

12 A. It says that.

13 Q. And that's a true statement, right?

14 A. It says that in Limitations, yeah.

15 Q. This paper does not establish cause  
16 between habitual or nonhabitual social media  
17 checking and differences in neural trajectories,  
18 right?

19 MS. COUCH: Objection. Misstates the  
20 paper.

21 THE WITNESS: I mean, this paper is  
22 using longitudinal methods that allow us to be --  
23 make meaningful conclusion about how social media  
24 is likely changing the developing brain.

25 BY MS. JONES:

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1 Q. Well, that wasn't -- my question wasn't  
2 about whether it allows you to make meaningful  
3 conclusions.

4 My question was: This paper, Maza and  
5 your other co-authors from 2023, does not establish  
6 cause between habitual or nonhabitual social media  
7 checking and differences in neural trajectories.  
8 That's what that says, right?

9 MS. COUCH: Objection. Misstates the  
10 paper.

11 THE WITNESS: No. That is not exactly  
12 what that says, no.

13 BY MS. JONES:

14 Q. Well, was it accurate when you and your  
15 co-authors wrote: It is difficult to determine  
16 whether social media use prior to data collection  
17 caused these distinct neural trajectories?

18 A. Yes.

19 THE WITNESS: Sorry.

20 MS. COUCH: Objection. Completeness.  
21 Continue.

22 THE WITNESS: Yes. As with many  
23 studies that we conduct, we always include these  
24 caveats that we cannot determine that something  
25 collected, for example, before we collected the

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1 data might be related to what we found.

2 BY MS. JONES:

3 Q. And you're not testifying that that  
4 limitation that you laid out there is incorrect,  
5 right?

6 MS. COUCH: Objection. Vague.

7 THE WITNESS: These are the limitations  
8 that we laid out here.

9 BY MS. JONES:

10 Q. Okay. And this paper does not  
11 establish causation?

12 MS. COUCH: Asked and answered.

13 THE WITNESS: As I mentioned, using  
14 these rigorous longitudinal methods, we can be  
15 confident that social media use at an earlier age  
16 is meaningfully contributing to these longitudinal  
17 increases in adolescents' -- is meaningfully  
18 contributing to longitudinal changes in  
19 adolescents' brains.

20 MS. JONES: I'm going to move to strike  
21 as nonresponsive.

22 BY MS. JONES:

23 Q. This paper cannot establish causation,  
24 right?

25 MS. COUCH: Asked -- asked and

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1 answered.

2 THE WITNESS: The methods that we've  
3 used here, these rigorous longitudinal designs in a  
4 relatively large sample size, can help us make very  
5 meaningful conclusions that social media use is  
6 meaningfully contributing to developmental changes  
7 in how the brain is developing across time.

8 BY MS. JONES:

9 Q. Sure. But you -- what you just said  
10 you didn't actually say in your paper, right?

11 MS. COUCH: Objection. Argumentative.

12 BY MS. JONES:

13 Q. What -- what your -- what -- excuse me.  
14 What your paper says is: It's  
15 difficult to determine whether social media use  
16 prior to data collection caused these sustained  
17 neural trajectories. Right?

18 MS. COUCH: Objection. Incomplete.

19 THE WITNESS: There is one limitation  
20 that we mentioned here. But we can probably read  
21 the full discussion, and I would be happy to do so,  
22 which will help us to understand the broader  
23 context of these findings.

24 BY MS. JONES:

25 Q. Well, let's go to the "Conclusions"

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1 section. It says: Adolescent social media use has  
2 proliferated extensively in the past decade. This  
3 longitudinal cohort study suggests that social  
4 media behaviors in early adolescence may be  
5 associated with changes in adolescents' neural  
6 development.

7 Do you see that?

8 THE WITNESS: Yes.

9 BY MS. JONES:

10 Q. And you all did not say "are  
11 associated." You said "may be associated," right?

12 A. That is the way scientists speak in  
13 empirical articles. When we say -- or I'll speak  
14 for myself. In our publication, when I and my  
15 colleagues in this paper say "may be," we mean  
16 probably, more likely than not, is associated with  
17 changes in adolescents' neural development.

18 Q. Sure, that's what you're saying today.  
19 But that's not what the -- the paper doesn't  
20 actually say that. Can we at least agree on that?

21 A. The way --

22 MS. COUCH: Objection. Misstates her  
23 answer.

24 THE WITNESS: The way we use language  
25 in the scientific literature, we use the word

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1 "may be" to say that these associations are  
2 probably, more likely than not, associated with  
3 changes in adolescents' neural development.

4 BY MS. JONES:

5 Q. You added -- I'm struck by the fact  
6 that you just added a lot of words to that sentence  
7 that actually appears in the paper from 2023. Have  
8 you done anything to go back and say, we're going  
9 to supplement our conclusions on this issue?

10 MS. COUCH: Objection. Argumentative.

11 THE WITNESS: The conclusion has not  
12 changed. I'm merely saying that, in an empirical  
13 article, we use the word "may be associated" to  
14 indicate that this association is probably, and  
15 more likely than not, associated with that outcome.

16 BY MS. JONES:

17 Q. But we -- we can acknowledge that --  
18 that there's a difference between what's written in  
19 the article and what you've just said here at your  
20 deposition, that those are different words that you  
21 just -- you've just described?

22 MS. COUCH: Objection. Misstates her  
23 testimony.

24 THE WITNESS: I am saying that we use  
25 the word "may be" to indicate that it is probably,

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1 or more likely than not, the case.

2 BY MS. JONES:

3 Q. Are -- are there other places where  
4 you've used the phrase "may be associated" to say  
5 "probably" or "more likely than not"?

6 A. Probably.

7 Q. And at any point did you say to your  
8 co-authors, "You know, actually, the data supports  
9 that it's probably, or more likely than not, the  
10 case that this is connected?"

11 MS. COUCH: Objection. Argumentative.

12 THE WITNESS: In publications and in  
13 this type of work, we use the word "may be" in that  
14 way.

15 BY MS. JONES:

16 Q. To say "probably" and "more likely than  
17 not"?

18 A. Yes.

19 THE WITNESS: I wouldn't mind a quick  
20 break.

21 MS. JONES: Yeah, certainly. I haven't  
22 been watching the clock.

23 MS. COUCH: Yeah, we've been about an  
24 hour and 20 minutes.

25 MS. JONES: Okay. Fine.

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1 MS. COUCH: Why don't we take -- it  
2 will probably -- because we have to go upstairs, it  
3 will probably take like seven or eight minutes to  
4 go downstairs --

5 MS. JONES: We should go off the  
6 record.

7 MS. COUCH: Sorry.

8 THE VIDEOGRAPHER: Going off the  
9 record. The time is 2:38 p.m.

10 \* \* \*

11 (Whereupon, there was a recess in the  
12 proceedings from 2:38 p.m. to 3:05 p.m.)

13 \* \* \*

14 THE VIDEOGRAPHER: Going back on the  
15 record. The time is 3:05 p.m.

16 BY MS. JONES:

17 Q. Dr. Telzer, your 2023 Maza paper that  
18 we were looking at, which I think is Exhibit 13,  
19 was that based on self-reporting of the  
20 participating adolescents?

21 A. Can you specify? What are you --  
22 what -- self-reporting what?

23 Q. That's a fair question.

24 A. Yeah.

25 Q. Self-reported -- self-reports of how

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1 often the participants were checking --

2 A. Yes.

3 Q. -- social media.

4 A. Yes, it was based on their self-report.

5 Q. Okay. And you agree that  
6 self-reporting can be inaccurate?

7 MS. COUCH: Objection. Vague.

8 THE WITNESS: I mean, we rely on  
9 self-report measures for many different measures  
10 and have shown that self-report measures are  
11 correlated with some objective measures.

12 BY MS. JONES:

13 Q. Sure. My question was: Do you agree  
14 with me that self-reports can be inaccurate?

15 MS. COUCH: Objection. Vague.

16 THE WITNESS: I don't know what you  
17 mean by "inaccurate."

18 BY MS. JONES:

19 Q. Let me -- do you know that you have, in  
20 fact, said that self-reporting of the use of  
21 digital technology is notoriously inaccurate?

22 MS. COUCH: Objection. Lacks  
23 foundation.

24 BY MS. JONES:

25 Q. Do you recall saying that?

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1 A. I don't recall saying that.

2 Q. Okay. Well, let us show that to you.

3 (TELZER EXHIBIT 15, Research Article  
4 titled Daily links between objective smartphone use  
5 and sleep among adolescents, was marked for  
6 identification.)

7 BY MS. JONES:

8 Q. I'm handing you what we've marked as  
9 Exhibit 15. Dr. Telzer, do you recognize  
10 Exhibit Number 15?

11 A. Yes.

12 Q. And Exhibit Number -- excuse me.  
13 Exhibit Number 15 is a paper on which you are a  
14 co-author, correct?

15 A. Correct.

16 Q. Do you recall this paper?

17 A. Yes.

18 Q. Okay. And this paper was published in  
19 2024, right? If you look at the first page down in  
20 the bottom --

21 A. Yep.

22 Q. -- left-hand corner. Yes?

23 A. Yes.

24 Q. And do you stand behind what's written  
25 in this paper?

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1 A. Yes.

2 Q. All right. Let me ask you to look at  
3 Page 1173. I'm using the pages up in the upper  
4 right-hand corner.

5 Down in the bottom -- you're welcome to  
6 look at whatever part you want to. But down in the  
7 bottom paragraph of that Section 4, entitled  
8 "Utilizing Objective Measures to Determine Within-  
9 Versus Between-Person Associations," about midway  
10 through the paragraph, there's a sentence that  
11 reads: Self-reports of digital technology use are  
12 notoriously inaccurate and may reflect subjective  
13 experiences rather than actual use. Right?

14 A. I see that, yes.

15 Q. And that's a true statement, right?

16 MS. COUCH: Objection.

17 THE WITNESS: That's what we wrote in  
18 this line here, yes.

19 BY MS. JONES:

20 Q. Well, my question is not just -- I know  
21 you wrote it. My question is: Is that a true  
22 statement?

23 MS. COUCH: Objection. Vague.

24 THE WITNESS: In the specific context  
25 of this, that is the case of what we wrote.

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1 BY MS. JONES:

2 Q. Is that statement still true today,  
3 that self-reports of digital technology use are  
4 notoriously inaccurate and may reflect subjective  
5 experiences rather than actual use?

6 A. I think self-report measures and -- and  
7 objective measures are complementary to each other.

8 Q. Sure. And I recognize that there are  
9 other measures of use that you have talked about in  
10 your report. I'm, for the moment, just focused on  
11 subjective self-reporting measures.

12 Your paper from 2023, the Maza paper,  
13 relied on self-reporting of social media checking,  
14 right?

15 A. In the context of this paper that you  
16 just had me look at, we're saying that self-report  
17 measures in the context of measuring time use,  
18 which is what we measure here, is -- and that is  
19 different from what we measured in the Maza paper,  
20 looking at how frequently they're saying that  
21 they -- or how frequently they're self-reporting  
22 their checking behaviors.

23 MS. JONES: I'm going to move to strike  
24 as nonresponsive.

25 BY MS. JONES:

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1 Q. My question was: In your 2023 Maza  
2 paper, you used self-reporting of social media  
3 checking, correct?

4 MS. COUCH: Asked and answered.

5 THE WITNESS: Yes.

6 BY MS. JONES:

7 Q. Now, the other thing we were just  
8 talking about before our break with respect to  
9 Exhibit Number 14, your 2023 Maza paper, was  
10 whether or not your paper showed causation. Do you  
11 remember those questions?

12 A. Yes.

13 Q. All right. And after your paper was  
14 published, you actually did an interview where you  
15 said that you didn't know; "We cannot make causal  
16 claims that social media is changing the brain."  
17 Do you recall that?

18 MS. COUCH: Objection. Lacks  
19 foundation.

20 THE WITNESS: I need the specific.

21 BY MS. JONES:

22 Q. Okay. Without me handing you  
23 something, you don't remember saying that about  
24 your paper?

25 A. I would need to see it, please.

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1 Q. Okay. Let me hand you what we're  
2 marking as Exhibit Number 16. Sorry --

3 A. Uh-huh.

4 Q. -- to make you reach.

5 (TELZER EXHIBIT 16, Document titled  
6 Social Media Use Is Linked to Brain Changes in  
7 Teens, Research Finds, The New York Times, was  
8 marked for identification.)

9 BY MS. JONES:

10 Q. Dr. Telzer, Exhibit Number 16 is a  
11 printout of an article from "The New York Times,"  
12 entitled "Social Media Use Is Linked to Brain  
13 Changes in Teens, Research Finds." Do you see  
14 that?

15 A. Uh-huh.

16 Q. You have to say "yes" or "no."

17 A. Yes. Sorry.

18 Q. And the date of the article is  
19 January 3rd, 2023 --

20 A. Yes.

21 Q. -- yes?

22 And the -- if you look at the actual  
23 article, it is describing your 2023 Maza paper on  
24 habitual checking behaviors on social media,  
25 correct?

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A. Yes. I think it links to that paper.

Q. And in the third paragraph --

Well, the first -- the first sentence in the article says: Teens who frequently checked social media showed an increasing sensitivity to peer feedback, although the cause of the changes was not clear.

Do you see that?

A. I see that.

Q. And it goes on to say in the third paragraph: A new study by neuroscientists at the University of North Carolina tries something new, conducting successive brain scans of middle schoolers between the ages of 12 and 15, a period of especially rapid brain development.

Do you see that?

A. I see that.

Q. And that -- that is referring to the group of folks, including yourself, who were involved in the study that eventually was published in "JAMA Pediatrics" in 2023, correct?

A. I don't know what you mean. So, yes. This study is referring to this paper.

Q. Yes. Okay. It goes on to say: The researchers found that children who habitually

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check their social media feeds at around age 12 showed a distinct trajectory, with their sensitivity to social rewards from peers heightening over time. Teenagers with less engagement in social media followed the opposite path, with a declining interest in social rewards.

Do you see that?

A. Yes.

Q. It says: The study, published on Tuesday in "JAMA Pediatrics," is among the first attempts to capture changes to brain function correlated with social media use over a period of years.

Do you see that?

A. Yes.

Q. It then goes on to say: The study has important limitations -- yes?

A. Yes.

Q. -- as the authors acknowledge. Because adolescence is a period of expanding social relationships, the brain differences could reflect a natural pivot toward fear -- excuse me -- toward peers, which could be driving more frequent social media use.

Did I read that correctly?

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A. Yes.

Q. And then it appears that you are quoted in the next paragraph. Quote, "We can't make causal claims that social media is changing the brain."

Did I read that correctly?

MS. COUCH: Objection. Incomplete.

BY MS. JONES:

Q. My question is just: Did I read that correctly?

A. You read that correctly. But the broader context of a one-hour interview and pulling out half a sentence does not give the whole picture of what I was talking about here.

MS. JONES: Okay. I'm going to move to strike everything after "you read that correctly."

My question was just: Did I read that correctly? It sounds like I did.

BY MS. JONES:

Q. My next question is: When you were interviewed by "The New York Times," did you endeavor to be accurate and truthful in what you said to "The New York Times"?

A. I was certainly accurate in the things I was saying to "The New York Times." And this was

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half of a sentence taken out of a one-hour interview.

Q. Okay. And it says: "We can't make causal claims that social media is changing the brain," said Eva -- and let me just pause there.

Did you -- recognizing there might be other contexts that you're thinking of, did you say those words: "We can't make causal claims that social media is changing the brain"?

A. That is half the sentence of a one-hour interview.

Q. Okay. Was there more of this sentence that you're recalling?

A. I went on to explain the nuance of what our findings meant, including the following, that, "Teens who habitually" -- "teens who are habitually checking their social media are showing these pretty dramatic changes in the way their brains are responding, which could have" -- "which could potentially have long-term consequences well into adulthood, sort of setting the stage for brain development over time."

But, again, this is in the context of a whole-hour interview.

Q. Sure. Okay. But just -- just so I'm

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1 very clear, you did say to "The New York Times,"  
 2 "We can't make causal claims that social media is  
 3 changing the brain," even though you also talked  
 4 about the fact that teens seem to be habitually  
 5 checking their social media.

6 MS. COUCH: Asked and answered.

7 BY MS. JONES:

8 Q. Yes?

9 A. Yes. I said that half sentence in the  
 10 context of a larger one-hour interview.

11 Q. Well, when -- when -- did you read this  
 12 article when it came out?

13 A. Yes.

14 Q. Did you go back to "The New York Times"  
 15 and say that you were somehow misquoted?

16 MS. COUCH: Objection. Argumentative.

17 THE WITNESS: No, I did not go back to  
 18 "The New York Times."

19 BY MS. JONES:

20 Q. Did you go back to them and say,  
 21 "Actually, what I really meant is maybe a causal  
 22 claim can be made about social media"?

23 MS. COUCH: Objection. Argumentative.

24 THE WITNESS: I did not go back to "The  
 25 New York Times."

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1 BY MS. JONES:

2 Q. Okay. And when you said, "We can't  
 3 make causal claims that social media is changing  
 4 the brain," recognizing that that is part of a  
 5 sentence -- you've read the rest of it -- was this  
 6 a true statement at the time?

7 MS. COUCH: Objection. Incomplete.

8 THE WITNESS: That is half of a  
 9 sentence of a broader hour-long interview that I  
 10 gave.

11 BY MS. JONES:

12 Q. Sure.

13 MS. JONES: I'm going to move to strike  
 14 as nonresponsive.

15 BY MS. JONES:

16 Q. My question was: Was that a true  
 17 statement at the time?

18 MS. COUCH: Objection. Vague.

19 THE WITNESS: That was half the  
 20 statement of a broader conversation of one hour I  
 21 had with the reporter.

22 BY MS. JONES:

23 Q. If I read -- if I read the whole  
 24 sentence -- "We can't make causal claims that  
 25 social media is changing the brain. But teens who

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1 are habitually checking their social media are  
 2 showing these pretty dramatic changes in the way  
 3 their brains are responding" -- is that a true  
 4 statement?

5 A. Is what -- sorry. Is what a true  
 6 statement?

7 Q. What I just read.

8 A. I mean, these are quotes from a -- a  
 9 much larger conversation that I had with the  
 10 reporter.

11 Q. And are the entirety of those quotes  
 12 true or were they true at the time?

13 MS. COUCH: Objection. Vague.

14 THE WITNESS: These are quotes taken  
 15 slightly out of context from the longer  
 16 conversation that we had.

17 BY MS. JONES:

18 Q. Yeah. My question was: Were they true  
 19 statements when you made them?

20 MS. COUCH: Asked and answered. Vague.

21 THE WITNESS: These are the -- these  
 22 are the statements -- or these are the sentences  
 23 that were quoted as part of a much larger  
 24 conversation that we had.

25 BY MS. JONES:

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1 Q. You understand I'm asking you  
 2 something -- do you know that I'm asking you  
 3 something slightly different, or are we missing  
 4 something somehow?

5 My question is: Were these true  
 6 statements when you made them at the time in 2023?

7 MS. COUCH: Asked and answered.

8 THE WITNESS: These statements are  
 9 taken out of context from a broader long discussion  
 10 that we had.

11 BY MS. JONES:

12 Q. Okay. So you couldn't tell me whether  
 13 the statements that are reported here by  
 14 "The New York Times" are true or not?

15 MS. COUCH: Asked and answered.

16 THE WITNESS: These statements are  
 17 taken out of a larger conversation that we had.

18 BY MS. JONES:

19 Q. Okay. And so you're not comfortable  
 20 telling me -- I think you told me you weren't  
 21 misquoted, right?

22 A. These are partial quotes taken out of a  
 23 long conversation that we had.

24 Q. Sure. But I -- my question is: Are  
 25 you -- did they get the words wrong?

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1 A. These sentence or even partial  
2 sentences are taken out of a larger one-hour  
3 conversation.

4 Q. Sure. During the rest of the  
5 conversation, at some point did you say, "We can  
6 make causal claims that social media is changing  
7 the brain"?

8 A. I don't recall our full conversation.

9 Q. Okay. And so it sounds like you don't  
10 remember whether you might have said anything  
11 contrary to what's reflected in this article?

12 MS. COUCH: Calls for speculation.

13 THE WITNESS: I'm saying that these  
14 partial sentences are taken out of context of the  
15 larger conversation we had.

16 BY MS. JONES:

17 Q. Let me ask you to look at --

18 (TELZER EXHIBIT 17, The Journal of  
19 Child Psychology and Psychiatry - Commentary: An  
20 updated agenda for the study of digital media use  
21 and adolescent development - future directions  
22 following Odgers & Jensen (2020), was marked for  
23 identification.)

24 BY MS. JONES:

25 Q. I'm handing you what we've marked as

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1 Exhibit Number 17. Do you recognize Exhibit  
2 Number 17, Dr. Telzer?

3 A. Yes.

4 Q. And just to orient ourselves, Exhibit  
5 Number 17 is a commentary written by you, Mitchell  
6 Prinstein and Jacqueline -- is it Nesi?

7 A. Yes.

8 Q. Okay. And published in 2020; is that  
9 right?

10 A. Yes.

11 Q. And you were responding at the time to  
12 a different piece of writing that had been  
13 published by two other experts.

14 A. Yes.

15 Q. Is that right?

16 A. Uh-huh.

17 Q. I'm going to ask you to look down at  
18 the bottom part of the left column --

19 A. Uh-huh.

20 Q. -- on the first page of Exhibit  
21 Number 17, if you wouldn't mind.

22 That paragraph -- that second paragraph  
23 on the left column begins by saying: Rates of some  
24 form of psychopathology, such as suicidal and  
25 nonsuicidal self-injurious thoughts and behaviors,

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1 depression and anxiety, also have increased over  
2 the past decade, leading many researchers to  
3 suspect a potential link between digital media use  
4 and increases in the prevalence of adolescents'  
5 psychological symptoms.

6 Do you see that?

7 A. I do.

8 Q. And towards the bottom of that same  
9 paragraph, you and your co-authors write:  
10 Interestingly, however, empirical data supporting  
11 the purported link between digital media use and  
12 adolescent psychopathology have yielded  
13 controversial -- controversially mixed findings.

14 Do you see that?

15 A. I do.

16 Q. Was that a true statement when this  
17 paper was published?

18 MS. COUCH: Object to form. Vague.

19 THE WITNESS: I mean, this is in 2020,  
20 reviewing some of the literature across these  
21 links, showing that there are mixed findings in the  
22 literature.

23 BY MS. JONES:

24 Q. Sure. And my question was: Was that a  
25 true statement that you and your co-authors

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1 published in 2020?

2 A. Yes, this is what we wrote in that  
3 paper.

4 Q. All right. And it was true --

5 MS. COUCH: Same objection.

6 BY MS. JONES:

7 Q. -- or not true?

8 A. This is what we wrote in the paper at  
9 the time.

10 Q. Okay. And you wouldn't have written it  
11 if you didn't believe it to be consistent with your  
12 review of the science?

13 A. At the time of reviewing the  
14 literature, there were mixed findings that we were  
15 pointing towards.

16 Q. Got it.

17 And then in the next paragraph, it  
18 says: The review offered by Odgers and Jensen --  
19 and then there is a parenthetical (2020) -- thus  
20 offers an important and compelling turning point in  
21 the literature by demonstrating that the length of  
22 time adolescents spend using digital media is not  
23 reliably associated with maladaptive outcomes, such  
24 as depression, anxiety, and risk behavior.

25 Do you see that?

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1 A. Yes.

2 Q. Do you believe that was a true  
3 statement in 2020?

4 A. Yes. We indicate we're referring to  
5 their publication, that this is what they were  
6 showing at the time, yep.

7 Q. And did -- do you recall whether you  
8 agreed with their conclusion that the length of  
9 time adolescents spend using digital media is not  
10 reliably associated with maladaptive outcomes, such  
11 as depression, anxiety, and risk behavior?

12 A. I don't recall at the time if I agreed  
13 with them or not, if that's what you're asking.

14 Q. Yes, that is what I'm asking.

15 A. I don't recall.

16 Q. You did not express disagreement in  
17 this commentary, right?

18 A. I'd have to reread the whole thing.  
19 It's been a while.

20 Q. Well, you're welcome to read the whole  
21 thing, but let me show you a specific reference in  
22 the next column, same paragraph at the bottom.

23 A. Okay.

24 Q. It begins with the word "nevertheless."

25 A. Uh-huh.

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1 Q. It says: Nevertheless, the data simply  
2 do not currently support that the number of hours  
3 adolescents spend using digital media is associated  
4 with increased risks for psychopathology or  
5 maladaptive behavior.

6 Did I read that correctly?

7 A. You read that correctly.

8 Q. Okay. And so this is not just you all  
9 reporting on what Odgers and Jensen have said.  
10 This is you all actually reporting on your  
11 understanding of the data at the time, right?

12 A. I believe that's the case, that -- that  
13 we were indicating at the time that the data don't  
14 support specifically examining the number of hours  
15 adolescents spend is associated with those risks.

16 Q. Do you -- is that statement still true  
17 today?

18 MS. COUCH: Objection. Vague.

19 THE WITNESS: Is that statement --  
20 which statement?

21 BY MS. JONES:

22 Q. The one we're talking about.

23 A. This "nevertheless" statement?

24 Q. Yes.

25 A. I think that it's complex and nuanced

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1 because we've moved beyond looking at the number of  
2 hours adolescents spend using digital media to try  
3 to understand multiple components of that use.

4 Q. And does that mean -- I'm not sure I  
5 understand how your -- that your -- how your answer  
6 responds to my question.

7 My question is: Do you stand behind  
8 that sentence as written today in 2025?

9 MS. COUCH: Objection. Argumentative.  
10 Vague.

11 THE WITNESS: I don't know what you  
12 mean by "stand by that statement today." At the  
13 time of writing this, the data didn't support  
14 specifically looking at the number of hours as  
15 associated with increased risk for psychopathology  
16 or maladaptive behavior. And most of our work now  
17 is not necessarily looking specifically at these  
18 broad metrics of the number of hours spent.

19 BY MS. JONES:

20 Q. And my question about whether you still  
21 stand behind it is simply, do you think that  
22 continues to be, in 2025, an accurate statement of  
23 the state of the data?

24 MS. COUCH: Objection. Vague.

25 THE WITNESS: In 2025 there's been a

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1 lot more research that has come out. But, also, I  
2 think it's very important to note that we've moved  
3 beyond the number of hours on social media to  
4 understand many other functions of it.

5 BY MS. JONES:

6 Q. Do you think in order to find  
7 causation -- and this is going to be a general  
8 question, so you can tell me if it's too general --  
9 in order to find causation, you first -- between  
10 two different things, you first need to establish  
11 an association?

12 MS. COUCH: Objection. Vague.

13 THE WITNESS: I think that's too  
14 general to respond.

15 BY MS. JONES:

16 Q. Do you think you can have causation  
17 without an association?

18 MS. COUCH: Objection. Vague.

19 THE WITNESS: I don't think that that  
20 makes sense. I can't answer that.

21 BY MS. JONES:

22 Q. You don't know?

23 A. I -- I don't understand how to answer  
24 that. It doesn't make sense to me.

25 Q. When you were doing your literature

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1 review in connection with your work as an expert in  
2 this case, did you -- did your search terms pull  
3 back the Odgers and Jensen paper from 2020?

4 A. I don't recall.

5 Q. Did you think it was worth citing in  
6 your long list of reliance materials that you've  
7 provided in the case?

8 A. I --

9 Q. Let me actually ask it a slightly  
10 different way. We looked at your reliance list --

11 A. Uh-huh.

12 Q. -- and Odgers and Jensen from 2020  
13 are -- is not on that list. Is there a reason that  
14 it's not on there?

15 A. No purposeful reason.

16 Q. Okay. Do you think it should be?

17 A. It is an article that I've read, so --  
18 it is in my brain, so we can add it to it.

19 Q. Well, you probably understand that we  
20 aren't in your brain. So our ability to know what  
21 you're relying on is based on the list that we get.

22 So do you think that the Odgers and  
23 Jensen paper is a paper that you, on reflection,  
24 should have on your reliance list?

25 MS. COUCH: Objection. Calls for legal

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1 reasoning.

2 THE WITNESS: I don't think that it  
3 needs to be on there. There's dozens of papers  
4 probably out there that are not on my reliance  
5 list. This includes other things I have read  
6 broadly, but I tried to be as thorough as I could  
7 for my reliance list.

8 MS. COUCH: Just clarifying the record,  
9 it's materials considered list.

10 THE WITNESS: Materials.

11 BY MS. JONES:

12 Q. Dr. Telzer, just to the exchange  
13 between you and your counsel, do you have an  
14 understanding of what the difference is between a  
15 reliance list and a materials considered list?

16 MS. COUCH: Objection. Calls for legal  
17 reasoning.

18 THE WITNESS: I'm not sure.

19 BY MS. JONES:

20 Q. You don't have an understanding?

21 A. I'm not sure I understand.

22 Q. What? The question or -- I'm just  
23 trying to make sure I'm clear on what you're not  
24 understanding so I can ask a different question.

25 A. I may understand the difference between

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1 a reliance list and a materials considered list.  
2 I'm not sure.

3 Q. Okay. Are those -- are those terms --  
4 the difference in those terms meaningful for you in  
5 terms of what you considered for purposes of your  
6 opinions?

7 A. I don't think so.

8 Q. Okay. I just want to make sure.

9 A. Yeah.

10 Q. Let me ask you to turn to Page 57 in  
11 your report. And -- I need to find my spot on the  
12 page here.

13 MS. JONES: Oh, thank you. Yes.

14 BY MS. JONES:

15 Q. About midway down the page on Page 57,  
16 you have a section entitled "Evidence of the  
17 neurobiological effects of social media in  
18 adolescents." Do you see that?

19 A. Yes.

20 Q. And you say: In the following  
21 sections, I provide strong evidence from rigorous  
22 empirical studies showing -- and then you have a  
23 list of items, right?

24 A. Uh-huh. Yes.

25 Q. And the first thing that you list is:

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1 how heightened reward sensitivity in the brain  
2 leads to reward-seeking behaviors, including  
3 engaging in digital status-seeking behaviors.  
4 Do you see that?

5 A. Yes.

6 Q. Now, can we agree that status-seeking  
7 occurs both online and offline?

8 A. Sure.

9 Q. Okay. And you've actually published on  
10 that topic; is that right?

11 A. On that topic status-seeking?

12 Q. Yeah.

13 A. Perhaps.

14 Q. Okay.

15 (TELZER EXHIBIT 18, Article titled  
16 Dispositional and Social Correlates of Digital  
17 Status Seeking Among Adolescents, was marked for  
18 identification.)

19 BY MS. JONES:

20 Q. Well, let me hand you what we've marked  
21 as Exhibit Number 18.

22 MS. COUCH: Did you say 18?

23 THE WITNESS: Digital status seeking,  
24 yep.

25 MS. JONES: Exhibit 18, yes.

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1 BY MS. JONES:

2 Q. And, Dr. Telzer, this is a paper on  
3 which you are an author along with Dr. Burnell, who  
4 we've spoken about earlier, and Dr. Trekels, Nesi  
5 and Prinstein, correct?

6 A. Yep.

7 Q. And this article was published in 2024,  
8 correct?

9 A. Yep.

10 Q. And the article, up in the abstract on  
11 the first page --

12 A. Uh-huh.

13 Q. And just to -- the article itself is  
14 called "Dispositional and Social Correlates of  
15 Digital Status Seeking Among Adolescents," correct?

16 A. Yes.

17 Q. And in the abstract, you and your  
18 co-authors write: Social media has transformed  
19 peer relationships among adolescents, providing new  
20 avenues to attain online status indicators such as  
21 likes and followers.

22 Do you see that?

23 A. Yes.

24 Q. And it also goes on to say: This study  
25 aimed to explore the associations between various

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1 dispositional and social factors and digital  
2 status-seeking behaviors among a sample of  
3 adolescents.

4 Do you see that?

5 A. Yes.

6 Q. And that sample included an N of 731,  
7 right?

8 A. Uh-huh.

9 Q. You have to say "yes" or "no."

10 A. Yes.

11 Q. In the first -- this is a -- is this --  
12 this is a peer-reviewed paper; is that right?

13 A. Yes.

14 Q. Okay. And in the very first paragraph  
15 of the introduction, it says: Social media provide  
16 adolescents with valuable opportunities to enhance  
17 their social standing and satisfy their  
18 self-presentation and relationship formation --  
19 formation needs.

20 Do you see that?

21 A. Yes.

22 Q. And then it goes on to say: However,  
23 social media can also be a source of alienation and  
24 ostracism -- ostracism -- excuse me -- thereby  
25 challenging adolescents' psychosocial well-being.

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1 Correct?

2 A. Correct.

3 Q. Now, this paper -- now, one thing I  
4 noticed about this paper is that you do acknowledge  
5 that social media can have benefits for adolescents  
6 in the very first sentence, correct?

7 A. Yes.

8 Q. This paper was not -- and you can tell  
9 me if I have this wrong -- cited anywhere in the  
10 section where you specifically are talking about  
11 digital status-seeking behaviors, is that right, in  
12 your report?

13 A. First, I guess, I want to revise my  
14 previous comment. I don't think I say that  
15 there -- that there are benefits to social media.  
16 I say that it offers them opportunities to enhance  
17 their social standing and satisfy their  
18 self-presentation. I don't qualify that as  
19 positive.

20 Q. Okay. Well, you say: Social media  
21 provides adolescents with valuable opportunities to  
22 enhance their social standing and satisfy their  
23 self-presentation and relationship formation needs.  
24 Yes?

25 A. Yes.

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1 Q. Okay. And you did not, in your report  
2 on Page 57, where you are specifically talking  
3 about reward-seeking behaviors, including engaging  
4 in digital status-seeking behaviors -- you did not  
5 actually refer to your own peer-reviewed paper on  
6 that topic?

7 A. This is just a overview of what the  
8 following sections are going to be talking about.  
9 So it does not include references, no.

10 Q. Did -- did you cite this paper anywhere  
11 in your report?

12 A. I don't recall.

13 Q. Do you think it would have been  
14 important to do so?

15 MS. COUCH: Objection. Calls for  
16 speculation.

17 THE WITNESS: I think -- not  
18 necessarily. I rely -- it's probably in my  
19 reliance -- or not reliance list. My materials  
20 considered list.

21 BY MS. JONES:

22 Q. Okay. Do you know whether you cited it  
23 in the body of your report?

24 A. I don't recall.

25 Q. Okay. Let's look at the Discussion

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1 section, which is on Page 190 in the upper  
2 left-hand corner.

3 A. Uh-huh.

4 MS. COUCH: Phyllis, I don't know if  
5 it's helpful, but it is cited in the report, if you  
6 want the reference.

7 MS. JONES: She cites it in her -- the  
8 body of her report?

9 MS. COUCH: Yeah.

10 MS. JONES: Sure. What's the  
11 reference?

12 MS. COUCH: Page 59 on the JCCP, and  
13 then it's a different page on the MDL that was  
14 incorporated.

15 MS. JONES: Okay.

16 BY MS. JONES:

17 Q. Dr. Telzer, I'm going to ask you,  
18 actually, to go to Page 191. I apologize.

19 MS. COUCH: Exhibit 18?

20 MS. JONES: Yes. If that's the 2024  
21 paper.

22 BY MS. JONES:

23 Q. On Page 191, down at the bottom of the  
24 first column on the left-hand side, there's a  
25 paragraph that begins with the word "further."

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1 Do you see that?

2 A. The paragraph that begins with  
3 "Further"?

4 Q. It's the bottom paragraph.

5 A. Oh, yeah. "Furthermore," yeah.

6 Q. Yeah. It says -- oh, I apologize. It  
7 does say "furthermore."

8 It says: Furthermore, while existing  
9 literature generally agrees that certain elements  
10 of social media, particularly the quantification of  
11 peer validation, stimulate the brain's reward  
12 system, the present findings did not provide  
13 evidence of a connection between reward sensitivity  
14 and digital status-seeking.

15 Did I read that correctly?

16 A. Yes.

17 Q. And is that an accurate accounting of  
18 what your study found in 2024?

19 A. Is that an accurate -- sorry --  
20 accounting of what?

21 Q. Is that an accurate accounting of what  
22 your study found in 2024 with respect to a  
23 connection between reward sensitivity and digital  
24 status-seeking?

25 MS. COUCH: Objection. Incomplete.

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1 THE WITNESS: In this -- in this paper?

2 BY MS. JONES:

3 Q. Yes. Yeah.

4 A. In this paper, we have a self-reported  
5 measure of reward sensitivity did not -- was not  
6 associated with digital status-seeking.

7 Q. And then, just to go back to your  
8 point, at the bottom of Page 59 in your report --

9 A. Uh-huh.

10 Q. -- to your counsel's earlier kind  
11 reference, there is a citation to Trekels 2024.

12 A. Yep.

13 Q. Is there any part of your report -- and  
14 if we've missed this, you can certainly tell me.

15 Is there any part of your report where  
16 you specifically call out that your findings did  
17 not provide evidence of a connection between reward  
18 sensitivity and digital status-seeking?

19 MS. COUCH: Objection. Incomplete.

20 THE WITNESS: Yeah, in my report I  
21 reviewed a plethora of other research and did not  
22 necessarily reference this specific sentence in  
23 this paper.

24 BY MS. JONES:

25 Q. Is -- is that finding still true today?

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1 A. What finding?

2 MS. COUCH: Objection.

3 BY MS. JONES:

4 Q. The one we just talked about between  
5 reward sensitivity and digital status-seeking.

6 A. There is other evidence that I refer to  
7 in -- in my report showing that things related to  
8 reward sensitivity, including an experimental  
9 design discussed right here, is related to  
10 status-seeking we see in other work that I refer to  
11 that it is associated with that.

12 Q. Yeah, my question -- I'm not sure what  
13 question you're asking.

14 MS. JONES: I'm going to move to strike  
15 as nonresponsive.

16 BY MS. JONES:

17 Q. My question was: Is the finding we  
18 were just talking about from your 2024  
19 peer-reviewed paper that it did not provide  
20 evidence of a connection between reward sensitivity  
21 and digital status-seeking, is that finding still  
22 true and correct today?

23 MS. COUCH: Objection. Incomplete.  
24 Asked and answered.

25 THE WITNESS: In this singular study,

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1 we found that self-reported reward sensitivity was  
2 not correlated with digital status-seeking  
3 behaviors. But the broader literature does support  
4 connections between reward sensitivity and digital  
5 status-seeking.

6 MS. JONES: Okay. I'm going to move to  
7 strike everything starting at "But the broader  
8 literature."

9 Okay.

10 (TELZER EXHIBIT 19, Article titled  
11 Youths' sensitivity to social media feedback: A  
12 computational account, was marked for  
13 identification.)

14 BY MS. JONES:

15 Q. I'm going to hand you what we've marked  
16 as Exhibit 19. Dr. Telzer, do you recognize  
17 Exhibit Number 19?

18 A. Uh-huh. Yes.

19 Q. And, specifically, do you recognize it  
20 as an article entitled "Youths' Sensitivity to  
21 Social Media Feedback: A Computational Account" by  
22 four different authors?

23 A. Yes.

24 Q. Published in October of 2024?

25 A. Yes.

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1 Q. And this is one of the studies that you  
2 cite in your written report on this subject of  
3 brain changes -- generally speaking, brain changes  
4 resulting from social media use?

5 A. Yes, I cite this study.

6 Q. Okay. Is this -- I'll call it the  
7 "Pinho study" that we've marked as Exhibit 19 -- an  
8 fMRI study?

9 A. I have to go back and look through it.  
10 This is an MRI -- an MRI study.

11 Q. Oh. Did you --

12 A. It's an MRI study.

13 Q. An MRI study?

14 A. Yes.

15 Q. Okay. This study, the authors  
16 acknowledge, did not actually show direct  
17 causation, correct?

18 A. Can you show me, please?

19 Q. Sure. On Page 6 of 11?

20 A. Did you say "6"?

21 Q. 6, yes. Sorry. Oh. Are you there?

22 A. Yeah. I'm there. Sorry.

23 Q. There's a -- that's okay.

24 There's a paragraph that begins on the  
25 left-hand side, bottom of the page, that says --

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1 begins with the word "last."

2 Do you see that?

3 A. Yeah.

4 Q. And it says: Last, our analyses  
5 revealed that the amygdala is a key region involved  
6 in processing social media feedback, and it is  
7 related to individual differences in problematic  
8 social media use and social anxiety.

9 While our results suggest that the  
10 amygdala is involved in these processes, it is  
11 important to note that this does not imply direct  
12 causation, and these processes were also associated  
13 with a distinct network of regions.

14 Did I read that correctly?

15 A. You read that correct.

16 Q. Okay. Did you include that caveat with  
17 respect to this study when you cited it in your  
18 report?

19 A. I was discussing the broader results in  
20 my report and my interpretations of these various  
21 strong computational models and rich data that they  
22 have access to, including millions of social media  
23 posts that they linked later to the brains of their  
24 sample.

25 MS. JONES: Yeah. I'm going to

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1 respectfully move to strike as nonresponsive.

2 BY MS. JONES:

3 Q. My question was: Did you include the  
4 caveat that was included by the authors of the  
5 Pinho paper in 2024 with respect to the fact that  
6 their findings do not imply direct causation?

7 MS. COUCH: Objection. Asked and  
8 answered.

9 THE WITNESS: I included their very  
10 compelling results based on -- and relied on their  
11 data and findings showing very compelling results  
12 by using these very sophisticated computational  
13 models and rich data to map -- rich social media  
14 data that they mapped onto their participants'  
15 brain development and did not necessarily include  
16 every caveat that they included in their  
17 limitations section.

18 BY MS. JONES:

19 Q. Let me just clarify one point,  
20 Dr. Telzer, while we're talking about it. On  
21 Page -- can I ask you to turn to --

22 MS. JONES: Thanks to Ms. Antoine.

23 BY MS. JONES:

24 Q. Could I ask you to turn to Page 160 of  
25 your report?

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MS. COUCH: Did you say 160 or 161?

MS. JONES: 160. Page 160.

BY MS. JONES:

Q. Dr. Telzer, as we read your report, there were three studies that you specifically referenced in Section 11.9 related to social media and brain development in terms of your specific opinions. And I want to ask you about whether there's anything else in terms of studies that you view as being supporting your specific opinions on social media and brain development, okay? Okay?

A. Okay.

Q. So on Page 160, down at the bottom of 160, there's the Armstrong-Carter paper, yes?

A. Yeah.

Q. And you were a co-author on that paper, yes?

A. Yes.

Q. Okay. And then on Page 161 there's a reference to your paper by Maza, et al., in 2023, yes?

A. Yes.

Q. And we've talked about the Maza paper from 2023, yes?

A. Yes.

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Q. And then at the bottom of the page, there's a reference to the Haber 2011 paper, yes?

A. Yes.

Q. That paper does not relate to social media and brain development, right? It just generally describes the anatomy?

A. Correct.

Q. Okay. And then on Page 162 of that same section, there's a reference to the Maza paper, about two-thirds of the way down --

A. Yes.

Q. -- under the figure note.

And then on Page 163, there is a reference to the da Silva Pinho paper --

A. Uh-huh.

Q. -- that we just looked at, right?

A. Correct.

Q. And then 165 refers to a study entitled "Tottenham," yes?

A. Yes.

Q. And that does not relate specifically to social media, correct?

A. Correct.

Q. And then 166 refers to Tottenham and Sheridan from 2009, right?

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A. Yes.

Q. And that does not relate specifically to social media and brain development, correct?

A. Correct.

Q. So in your Section 11.9 that is titled "Social Media and Brain Development," the three studies that you cite are your own paper, Armstrong-Carter 2023, the Maza paper and the da Silva Pinho paper, correct?

A. That's what I cite.

Q. Okay. And you then have this underlined statement at the end of that section on Page 166 that says: These findings provide strong evidence that social media use across the adolescent years predicts different brain development into adulthood underscoring the lasting effects of social media use on the brain in adulthood.

Do you see that?

A. I see that.

Q. Now -- that particular conclusion does not appear in Armstrong-Carter or your Maza paper from 2023 or da Silva Pinho. Is that fair to say?

A. That statement is based on reviewing all the literature and putting together the

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complementary findings across multiple studies.

Q. Okay. And -- that's -- that's fair enough. I understand that point.

My question is: Does -- do any of those three studies actually say that social media use across the adolescent years predicts different brain development into adulthood?

A. No singular --

MS. COUCH: Asked and answered.

THE WITNESS: Yeah. Sorry.

No singular study indicates that amongst those three that you indicated. My statement there is based on putting all of the literature together and understanding these effects across the broader literature that I cite here and considered in my materials.

BY MS. JONES:

Q. And I just want to make sure I'm -- I understand your point around kind of all of the literature. Are there any -- is there any specific paper that you're thinking of that says some version of what you have written and underlined on Page 166 of your report that we haven't otherwise talked about?

MS. COUCH: Asked and answered.

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THE WITNESS: That underlined statement is based on reviewing all of these studies together in their totality and how they help us come to that conclusion by considering all of the studies together.

BY MS. JONES:

Q. Fair enough. But there's not one that you would say, "Oh, I got that from there," right?

A. That statement is not in a singular study but comes from putting all of the studies and all of the findings together that I reviewed here.

Q. Okay. And you specifically refer to social media use across the adolescent years predicting different brain development into adulthood, right?

A. I say that there, yes.

Q. What -- what study could you point me to where brain development up to and -- into the beginning of young adulthood where that has actually been evaluated in a systematic way?

A. There have been --

MS. COUCH: Objection. Vague.

THE WITNESS: -- multiple studies that I can refer to; that the da Silva Pinho study shows that their social media use in adolescence is

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predicting their brain development in adulthood.

BY MS. JONES:

Q. Any others that you're thinking of?

A. I reviewed a lot of literature. There are others. I can -- that are included in my materials considered.

Q. But just -- I'm just ask -- to be fair to you, I know you've included a lot of things. But I'm just asking, sitting here today, is there anything else that comes to mind for you as having established that proposition of brain changes in -- brain development changes up to adulthood?

A. I can --

MS. COUCH: Asked and answered.

Go ahead.

THE WITNESS: I can think of other studies that I included in my materials considered that use longitudinal methods and look at brain development across adolescence to adulthood.

BY MS. JONES:

Q. Okay. Can you name any of them for me other than the one you've mentioned, which is the da Silva Pinho study?

A. There's a handful. Crone is one author that has done this work.

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Q. Okay. Any others?

A. I can't think of specific names off the top of my head.

Q. And in your -- in your paper, the Maza 2023 paper, you actually said -- I'm sorry. You were writing something down.

In the Maza 2023 paper, you actually -- you and your co-authors actually say -- this is Exhibit 18 -- not 18. I think it's 13, if you want to look at it -- moreover, examination of social media checking behaviors across time is needed to further elucidate associations with development.

A. Sorry. I didn't hear that.

Q. That's okay. Exhibit 13, Page 165, down at the bottom.

A. Yeah.

Q. Just in terms of the existence of data that actually tracks into adulthood, one of the limitations of your Maza 2023 study that you and your co-authors call out is: Examination of social media checking behaviors across time is needed to further elucidate associations with development. Right?

A. We say -- we say that, yes.

MS. JONES: May I suggest a relatively

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quick break? It will help us figure out, like, what it makes sense to do today versus before we finish up.

MS. COUCH: Yeah, we can certainly take a break. I mean, we would definitely want to keep going since it's only been five hours --

MS. JONES: No, no. We can certainly keep going, but it will help me be more organized and making use of whatever time we're going to use today --

MS. COUCH: Yeah. That's fair.

MS. JONES: -- if we take a break.

MS. COUCH: We can take five minutes.

THE VIDEOGRAPHER: Going off the record. The time is 3:57 p.m.

\* \* \*

(Whereupon, there was a recess in the proceedings from 3:57 p.m. to 4:09 p.m.)

\* \* \*

THE VIDEOGRAPHER: Going back on the record. The time is 4:09 p.m.

BY MS. JONES:

Q. Dr. Telzer, let me ask you to pull out Exhibit Number 11, which is already in your stack. If it helps, it's the Armstrong-Carter paper.

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1 A. The momentary links?

2 Q. Yes.

3 A. Okay.

4 Q. This is a paper on which you were a  
5 co-author, and it was published in April of 2023;  
6 is that right?

7 A. Yes.

8 Q. Okay. And I will not -- just in the  
9 interest of time, I will not march you through  
10 every element of this paper.

11 But just looking at the abstract  
12 quickly, it says: This longitudinal ecological  
13 momentary assessment study examined whether  
14 adolescents' use of social media to interact with  
15 peers relates to their experiences of social  
16 connectedness, social craving, and sensation  
17 seeking on an hourly level.

18 Do you see that?

19 A. Yes.

20 Q. And it refers to a sample size of 212  
21 adolescents, right?

22 A. Yes. Sorry. Yes.

23 Q. That's okay.

24 And it goes on to say: Further, we  
25 investigated whether these associations differed

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1 for adolescents who were nominated by their peers  
2 as more or less susceptible to social influences,  
3 because highly susceptible youth may be more  
4 strongly impacted by social media due to heightened  
5 focus on peer behaviors and social feedback.

6 Do you see that?

7 A. Yes.

8 Q. And that's a true statement, right?

9 A. That's what we wrote here, yes.

10 Q. Okay. And it goes on to say:

11 Controlling for both daily and between-subject  
12 effects, we found a consistent pattern of  
13 hourly-level results that were robust to  
14 sensitivity analyses. When highly susceptible  
15 adolescents used social media to interact with  
16 peers in the last hour, they felt less socially  
17 connected to others and more strongly craved social  
18 connections and novel sensations.

19 Did I read that correctly?

20 A. You read that correct.

21 Q. Then it goes on to say: Youth who are  
22 particularly sensitive to social input from peers  
23 may feel less connected to others and crave more  
24 connections and exciting stimuli within one hour  
25 after using social media to interact with peers.

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1 Is that right? Did I read that  
2 correctly?

3 A. You read that correctly.

4 Q. Okay. And this Armstrong-Carter paper  
5 is the Armstrong-Carter paper that we were just  
6 discussing in connection with Section 11 -- I  
7 think -- .9 of your written report; is that right?  
8 You can certainly double-check. On Page 160, I  
9 believe.

10 A. Yes. Let me see. Okay.

11 Q. Is this Armstrong-Carter paper at  
12 Exhibit Number 11 the Armstrong-Carter paper that  
13 you cite, for example, on Page 160 of your report?

14 A. Yes.

15 Q. Let me ask you just about a couple of  
16 points in that paper. I wanted to ask you to turn  
17 to Page 4.

18 A. Yeah.

19 Q. Are you on Page 4?

20 A. I'm on Page 4.

21 Q. Okay. Sorry. I was -- I apologize. I  
22 was looking at the page that your other hand had,  
23 and I thought, "That doesn't look like Page 4."

24 A. Yeah.

25 Q. Okay. You're on Page 4.

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1 About midway down the page, there's a  
2 section entitled "Individual Differences by  
3 Susceptibility to Peer Influences." Do you see  
4 that?

5 A. Yes.

6 Q. Okay. And the first sentence in that  
7 paragraph says: Social media does not impact all  
8 adolescents uniformly; it may be relatively more or  
9 less beneficial for some adolescents compared to  
10 others.

11 Do you see that?

12 A. Yes.

13 Q. And that's a -- that's a statement that  
14 you and your co-authors believed to be valid based  
15 on the research in 2023 when you published this  
16 paper, correct?

17 A. Yes, that sentence references these two  
18 other publications discussing that it is not  
19 impacting all adolescents uniformly.

20 Q. And sitting here today, Dr. Telzer, do  
21 you agree with that statement, that social media  
22 does not impact all adolescents uniformly? It may  
23 be relatively more or less beneficial for some  
24 adolescents compared to others?

25 A. My work looks at individual differences

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1 and so that statement suggests, similar to many of  
2 the other studies that I've done, that there are  
3 these individual differences in that effect.

4 Q. And, I'm sorry. I'm not sure if I  
5 understood your answer. Does that mean that you --  
6 sitting here today, you still believe that's true  
7 or accurate?

8 A. Social media does not impact all  
9 adolescents uniformly is what we said here. It's  
10 generally agreed upon.

11 Q. Okay. I wanted to ask you about a  
12 portion of this study that we talked about a little  
13 bit earlier. But I want to come back to -- on  
14 Page 15, which is the "Limitations and future  
15 directions" section.

16 A. Okay.

17 Q. Can I use -- just to pause before we  
18 talk about the specifics, Dr. Telzer, for any of  
19 the papers that we've shown you in our time  
20 together so far, are there any where you looked at  
21 them and you said, "That's not what I believe  
22 anymore," as a scientist, as a researcher, or as an  
23 academic?

24 MS. COUCH: Objection. Broad.

25 THE WITNESS: I mean, each publication

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1 is important and contributes to my understanding,  
2 broadly speaking.

3 BY MS. JONES:

4 Q. But are there any that -- where you  
5 were co-author -- a co-author where you thought,  
6 "Actually, my -- my thinking has shifted, and I  
7 actually have a different view on that subject"?

8 MS. COUCH: Objection. Broad.

9 THE WITNESS: I can't give you a  
10 specific example, but my understanding of these  
11 effects has evolved as more research has come out.

12 BY MS. JONES:

13 Q. Okay. And when you say your  
14 understanding of the effects has evolved, what does  
15 that mean exactly?

16 A. It means that my understanding today is  
17 built upon the foundation of research that has come  
18 out. There's been lots of foundational research  
19 that's come out since this paper. And so my  
20 knowledge has been built upon the continuing  
21 foundation that has built up.

22 Q. Got it. Okay.

23 But I -- is there anything that I've  
24 shown you today so far where you thought, "Doggone  
25 it, I don't believe that anymore," as Dr. Eva

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1 Telzer?

2 MS. COUCH: Asked and answered.

3 THE WITNESS: The -- my understanding  
4 today has been built and increased over the years  
5 with what has come out. And it is an evolving  
6 field, and my opinions have been -- have relied  
7 upon all of the emerging literature that's come out  
8 since this, since the papers before that, since the  
9 papers before that. It's an iterative process.

10 BY MS. JONES:

11 Q. Yeah. Fair enough.

12 But I -- I didn't hear you saying,  
13 "Well, there's some element of some of my published  
14 work," or, "I have truly turned a corner in terms  
15 of thinking, you know, up was up, and now I think  
16 up is down."

17 A. Each publication contributes to my  
18 understanding. They all build on each other. They  
19 all build the foundation for my understanding and  
20 my opinions.

21 Q. Okay. Is there a mechanism for someone  
22 who does what you do, academic research, to  
23 actually communicate to the academic community, "I  
24 once thought this, but I now think something  
25 different than what I might have published"?

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1 MS. COUCH: Objection. Vague.

2 THE WITNESS: I mean, each publication  
3 builds upon the prior and builds those opinions and  
4 builds that research base. So newer research sort  
5 of builds upon the past research and tells what the  
6 current sort of understanding is.

7 MS. JONES: And I'm respectfully going  
8 to move to strike as nonresponsive, because I think  
9 my question was slightly different.

10 BY MS. JONES:

11 Q. My question was: In the work that you  
12 do, is there a mechanism for someone who does a lot  
13 in the world of academic peer-reviewed literature  
14 to communicate to colleagues and fellow  
15 researchers, "I published this at one point, but  
16 I've now" -- you know, "my views have shifted in a  
17 meaningful way"? Is there a mechanism for doing  
18 that is my question.

19 MS. COUCH: Objection. Vague. Asked  
20 and answered.

21 BY MS. JONES:

22 Q. And if you don't know, that's fine.  
23 I'm just asking.

24 A. The -- the mechanism is that the  
25 research that comes out is building upon prior

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1 literature and describes the current understanding.  
2 And as new research comes out, we build upon that,  
3 and that represents the current understanding.

4 Q. Got it.

5 And so if we -- if we wanted to know  
6 what Dr. Telzer thinks today or at least --

7 A. Uh-huh.

8 Q. -- relatively proximate to today, we  
9 could safely look at your most recent literature  
10 and say, "That's a reflection of her views." Is  
11 that fair?

12 A. I would say any singular study is my  
13 view of that sort of singular finding of that  
14 publication. My broad views, my broad  
15 understanding are represented in my report.

16 Q. Sure. Okay. So let me ask the  
17 question a slightly different way.

18 On -- on the particular -- if we wanted  
19 to know what Dr. Telzer thought about the specific  
20 subject of any one of the papers we've been talking  
21 about, we could comfortably rely on your latest  
22 publication on that topic to capture your views; is  
23 that right?

24 MS. COUCH: Objection. Vague.

25 THE WITNESS: A current publication

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1 will not necessarily describe views or opinions but  
2 will describe the data and the findings of that  
3 particular paper.

4 BY MS. JONES:

5 Q. Okay. The -- the broader views that  
6 you say are now reflected in the report that you  
7 generated for litigation --

8 A. Uh-huh.

9 Q. -- have you ever published those  
10 broader views anywhere in the peer-reviewed  
11 literature?

12 A. I think that the combination of all my  
13 research together comes together to support these  
14 views, absolutely.

15 I -- I edited a handbook that  
16 represents most of the views in here. I did a  
17 thorough examination of topics related to social  
18 media addiction, to body image concerns, to online  
19 social communication, to adolescent mental health.

20 Q. And you think if we add all those  
21 things together, it results in the opinion you've  
22 expressed in your litigation report that social  
23 media use can cause a number of negative mental  
24 health harms, including depression, anxiety, and  
25 loss of sleep?

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1 MS. COUCH: Objection. Vague.

2 THE WITNESS: Are you asking if you put  
3 together all my publications and everything I've  
4 relied upon, who would come to that?

5 BY MS. JONES:

6 Q. No. My -- my question is: You said,  
7 "My broader views are reflected in my -- in my  
8 report," right? Yes?

9 A. Yes.

10 Q. And your report -- and your report is  
11 something that was generated for purposes of  
12 litigation, correct?

13 A. This report is the compilation of all  
14 of the review that I've done on the literature, my  
15 own work, discussions across many different groups  
16 that have helped me to come to these conclusions.

17 Q. Yeah. Sure. But the -- you -- you  
18 wrote that report for litigation, yes?

19 A. I wrote this report for litigation,  
20 yes.

21 Q. Okay. At the request of lawyers for  
22 the plaintiffs in these cases, right?

23 A. Yep, that was my assignment.

24 Q. Okay. And so my question is: Have  
25 you, outside of the setting of litigation,

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1 published what I heard you describe as your broader  
2 views that are captured in your report elsewhere in  
3 the peer-reviewed literature?

4 MS. COUCH: Objection. Asked and  
5 answered. Vague.

6 THE WITNESS: I have published  
7 extensively on this topic, and all the individual  
8 publications together would come to the same  
9 conclusions that I include in my report. And many  
10 of the talks that I give, I have given many of the  
11 conclusions and general opinions that I include in  
12 here. My handbook that I edited includes topics,  
13 all of which are described in this report. And so  
14 the compilation of all of that would come to the  
15 same conclusion.

16 BY MS. JONES:

17 Q. Do you think, based on the existing  
18 scientific literature and the data that the  
19 academic research community has, that you would  
20 feel comfortable submitting for peer review a paper  
21 that said social media use can cause negative  
22 mental health harms?

23 A. I would absolutely feel comfortable  
24 doing that.

25 Q. Okay. You've not done that so far; is

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1 that right?

2 A. I cannot recall off the top of my head  
3 if that exact statement is in a publication.

4 Q. Okay. But you're not remembering it  
5 sitting here today?

6 A. I don't remember it sitting here today.  
7 But I would absolutely feel comfortable publishing  
8 that and would be thrilled to publish the work that  
9 I have done here that all pulls together many of  
10 the opinions that I have in this report.

11 MS. COUCH: Just a reminder, it's  
12 confidential.

13 THE WITNESS: What's confidential?

14 MS. COUCH: Your report.

15 THE WITNESS: No, I know. No, I'm not  
16 going to --

17 MS. COUCH: I'm sure defendants would  
18 appreciate that.

19 THE WITNESS: -- publish this. The  
20 work that I have -- that -- sorry. Yeah, I'm  
21 not -- I'm not publishing the report.

22 BY MS. JONES:

23 Q. We -- we're not -- we're not worried  
24 about that. That's fine. That's fine. But thank  
25 you for the reminder.

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1 Okay. So let's look at Page 15 of the  
2 Armstrong-Carter, which is Exhibit Number 11, the  
3 "Limitations and future directions" section.

4 And we talked about the first couple of  
5 these limitations. We won't revisit those. But at  
6 the bottom of the page, there's a sentence that  
7 begins "As we have emphasized." Do you see that?

8 A. I do.

9 Q. It says: As we have emphasized, it is  
10 highly likely that the associations between social  
11 media use and social well-being are bidirectional.

12 Do you see that?

13 A. I do.

14 Q. And give me the nutshell for what you  
15 mean by "bidirectional."

16 A. What I mean or what is inferred here by  
17 "bidirectional" is -- and we go on to discuss this  
18 in more detail -- that although we asked  
19 adolescents about their previous social media use  
20 in the last hour and their current feelings of  
21 social connection and motivations, it is also  
22 possible that these effects are bidirectional in  
23 that adolescents' feelings of social connection and  
24 motivations are also related to their social media  
25 use.

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1 Q. Okay. And what it specifically says  
2 is: Although we asked adolescents about their  
3 previous social media use in the last hour and  
4 their current feelings of social connections and  
5 motivations, it cannot be determined from these  
6 data whether feelings of connectedness, social  
7 craving, and sensation seeking preceded the use of  
8 social media or were affected by the social media  
9 use.

10 Do you see that?

11 A. I see that.

12 Q. And that's -- that's an accurate  
13 statement based on the work done in connection with  
14 this study, right?

15 A. That's one of the caveats that we're  
16 describing in the limitations section.

17 Q. And one of the implications of that  
18 caveat is, we don't know whether the feelings that  
19 are described here of connectedness, of social  
20 craving, of sensation seeking existed before the  
21 use of social media?

22 A. It is saying that it could be  
23 bidirectional. The way we measure these variables,  
24 we -- we're confident that the effect was in one  
25 direction because we asked them about social media

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1 in the past hour and their current feelings of  
2 social motivations.

3 And so by asking about preceding  
4 experiences and current motivations, we believe  
5 that the effect is in that direction.

6 Q. I'm sorry. You said, "We're confident  
7 that the effect was in one direction"? Was that  
8 what you said?

9 A. If you look at the broader discussion  
10 section --

11 Q. I'm sorry, Dr. Telzer. I was just  
12 asking about your testimony. Did you say, "We're  
13 confident that the effect was in one direction"?

14 A. I'm saying that we, as researchers, are  
15 confident based on the way that we do the  
16 research --

17 Q. Okay.

18 A. -- and that in a limitations section,  
19 we always include these -- these caveats. They're  
20 standard to indicate that we would need to be  
21 cautious. I mean, I'm a cautious researcher.

22 Q. Okay. And in your capacity as a  
23 cautious researcher, along with your co-authors,  
24 you wrote: As we have emphasized, it is highly  
25 likely that the associations between social media

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1 use and social well-being are bidirectional.

2 Right?

3 A. I said that, yes.

4 Q. And "bidirectional" doesn't mean things  
5 are running in one direction; it means things are  
6 running in two directions, just so we know what  
7 that term means, yes?

8 A. Yes.

9 Q. Now, the last portion of that  
10 limitations section, it says: To clarify causal  
11 pathways, future -- sorry. Are you there on  
12 Page 16?

13 A. Sorry. I moved.

14 Q. That's okay.

15 A. Yeah.

16 Q. To clarify causal pathways, future  
17 experiments could randomly assign adolescents to  
18 use social media (or not) and examine the causal  
19 impact on their feelings of connectedness, social  
20 craving, and sensation seeking.

21 Do you see that?

22 A. I do.

23 Q. Have you been involved in any such  
24 future experiments?

25 A. We have some experiments going on

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1 currently looking at this kind of question.

2 Q. Has any of that work been published?

3 A. We have -- it's ongoing data collection  
4 that we just completed.

5 Q. Has any of that work been published?

6 A. It has not been published.

7 Q. And so the data has been collected, but  
8 has the data yet been fully analyzed?

9 A. It has not been fully analyzed.

10 Q. Okay. And so it sounds like you've not  
11 evaluated it, put it into a manuscript, submitted  
12 it for peer review, right?

13 A. No.

14 Q. Okay. So we don't know, sitting here  
15 today, what that paper will ultimately look like if  
16 and when it's eventually published, right?

17 A. Nope.

18 Q. I think you told me earlier we can't  
19 predict the future, alas.

20 Okay. Let me ask you to look at  
21 Page 126 of your report. And that includes a  
22 section numbered 11.4, "Neural Vulnerabilities for  
23 Problematic Social Media Use and Depression." Do  
24 you see that?

25 A. I do.

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1 Q. There is nothing in your -- well,  
2 having reviewed your report, it did not appear that  
3 you had offered any opinions about a way to  
4 identify a vulnerable subpopulation of adolescents.  
5 Am I correct in my read of your report?

6 A. I don't think I understand the  
7 question.

8 Q. Well, you say in the second line of  
9 your report: Not all adolescents are equally prone  
10 to develop problematic social media use. Correct?

11 It's the second sentence in that  
12 paragraph under 11.4.

13 A. Yes.

14 Q. And it goes on to say: Those who do  
15 may have individual predispositions, including  
16 possible biological vulnerabilities that increase  
17 sensitivity to social media cues.

18 Do you see that?

19 A. Yes.

20 Q. Then it goes on to say: Specifically,  
21 adolescents who are more sensitive to social  
22 rewards may be particularly likely to seek out  
23 social media incentives and thus may be more  
24 susceptible to the provocation of continued use.

25 Do you see that?

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1 A. I do.

2 Q. And you conclude that paragraph by  
3 saying: Thus, we sought to examine neural  
4 vulnerabilities that may explain which adolescents  
5 develop problematic social media use.

6 A. Yes.

7 Q. Okay. My question is: Are you aware  
8 of any way to distinguish or identify this  
9 population of adolescents or teenagers who have  
10 neural vulnerabilities?

11 A. We are scanning adolescents' brains and  
12 using that understanding and looking at how their  
13 change -- how their brain is changing  
14 developmentally to predict whether or not they  
15 engage in problematic social media use by being  
16 able to understand that some adolescents who  
17 develop problematic social media use have  
18 differences in how their brain is developing. That  
19 would be considered a neural -- neural  
20 vulnerability.

21 Q. I may not have been clear in my  
22 question. Understanding that point, are you aware  
23 of any way to identify adolescents or teenagers who  
24 might have some kind of neural vulnerability versus  
25 those who do not?

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1 A. We are scanning their brains, and by  
2 being able to look at a large sample of adolescents  
3 and predict later -- later problematic social media  
4 use, we qualify or consider that that neural  
5 profile is a neural vulnerability.

6 Q. When you -- and when you say, "We  
7 consider that neural profile to be a neural  
8 vulnerability," what is the neural profile that  
9 you're identifying comprised of?

10 A. If you look at the figure on  
11 Page 128 --

12 Q. Uh-huh.

13 A. -- we are scanning developmental  
14 changes across puberty in their brains. And we're  
15 trying to understand if there are different neural  
16 trajectories and how their brains are developing  
17 that might help us understand individual  
18 differences in who goes on to develop problematic  
19 social media use by being able to say that this --  
20 it's not colored here. I don't know if it is in  
21 your version. It might be helpful. It's upside  
22 down. Yeah, this one is colored.

23 Q. Oh, is it? I was going to say it's  
24 not. That's a pleasant surprise.

25 A. The red line there is showing the

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1 adolescents who have relatively high problematic  
2 social media use. So we quantify that as a  
3 neurobiological vulnerability because that  
4 developmental change in the brain is predicting the  
5 group of adolescents who go on to develop higher  
6 levels of problematic social media use.

7 Q. And I just want to make sure I have a  
8 handle on your testimony here. So what exactly --  
9 when you're trying to understand the neural profile  
10 of what you've described as a vulnerable adolescent  
11 with respect to social media use, what are you  
12 specifically able to identify, if anything, at this  
13 point?

14 A. In this particular study, we were  
15 looking at how developmental changes -- changes in  
16 the brain of adolescents across puberty -- and this  
17 is relatively ages 12 to 16 or so -- how their  
18 brains are developmentally changing across that  
19 developmental period in ways that may help us  
20 identify which adolescents go on to develop social  
21 media addiction.

22 Q. And on that last point, help us  
23 identify who might go on, does the science exist  
24 today to identify those adolescents?

25 A. This study is not identifying a

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1 specific adolescent. This study is showing that  
2 there are differences in the way that the brains of  
3 adolescents are developing that can determine who  
4 goes on to become or engage in problematic social  
5 media use.

6 So adolescents whose brains are showing  
7 one certain developmental trajectory are those who  
8 are more likely to develop problematic social media  
9 use several years later.

10 Q. Can -- can the -- can the developmental  
11 indicators or changes that you're describing be the  
12 result of things other than social media?

13 A. I am not sure I can speculate on that  
14 so generally speaking.

15 Q. Well, I guess my question is: Could  
16 you have an adolescent or a teenager who never uses  
17 social media, and nevertheless, based on evaluating  
18 their brain developmental trajectory, you might see  
19 the same trends that you see in a teenager who did  
20 use social media and might show some kind of brain  
21 development changes?

22 MS. COUCH: Objection. Vague.

23 THE WITNESS: I'm not sure I could  
24 speculate on that hypothetical. We're looking  
25 at -- across a population of adolescents and

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1 looking at these trends and not at, you know,  
2 one -- one adolescent.

3 BY MS. JONES:

4 Q. And it sounds like, sitting here today,  
5 putting aside what might be learned at some point  
6 in the future, you have not -- you and your  
7 colleagues have not identified a particular  
8 vulnerable subpopulation of adolescents who would  
9 be more likely to develop what you've described as  
10 "problematic use"?

11 MS. COUCH: Objection. Vague.

12 THE WITNESS: I think that based on  
13 this study, we can come to the conclusion that  
14 adolescents, their brains are developing in very  
15 important and unique ways. And those whose brains  
16 are developing in ways demonstrated in this figure  
17 with this -- I think it was the blue line, that is  
18 considered a neurobiological vulnerability that  
19 will tell us that there are differences or,  
20 basically, these risk factors in the brain that may  
21 make an adolescent more vulnerable to develop  
22 social media addiction later in life.

23 BY MS. JONES:

24 Q. Are there -- putting aside social  
25 media, is it your experience, understanding, that

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1 there are certain adolescents or teenagers who  
2 might be more vulnerable to certain mental health  
3 diagnoses as they develop?

4 MS. COUCH: Objection. Vague.

5 THE WITNESS: I think that's a pretty  
6 general question. And my understanding of the  
7 literature is, there are neural vulnerabilities  
8 also for mental health.

9 BY MS. JONES:

10 Q. Okay. So neural vulnerabilities can  
11 exist whether or not an adolescent is exposed to  
12 social media ever? I just want to make sure I'm  
13 kind of understanding your opinion on this.

14 A. I mean, there are different neural  
15 vulnerabilities that predict different outcomes.  
16 There are neural vulnerabilities that might predict  
17 something like depression or mental health. And in  
18 this particular study, we found that there are  
19 neural vulnerabilities that do predict whether an  
20 adolescent develops problematic social media use.

21 (TELZER EXHIBIT 20, Article titled  
22 Developmental changes in brain function linked with  
23 addiction-like social media use two years later,  
24 was marked for identification.)

25 BY MS. JONES:

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1 Q. I'm going to hand you what we've marked  
2 as Exhibit Number 20. And when we were looking at  
3 your report, one of the papers that you cited was  
4 what's described as the "Flannery 2024" paper; is  
5 that right?

6 A. Yes.

7 Q. And Flannery 2024 is actually -- it  
8 appears to be the paper that's cited as part of the  
9 figure note on Page 128 of your report?

10 A. Correct.

11 Q. Okay.

12 A. That's what I was just referring to.

13 Q. Okay. And is what I just handed you --  
14 I think Exhibit Number 20 -- is that right?

15 A. Yes.

16 Q. Okay. Is Exhibit Number 20 the  
17 Flannery paper that is referred to in your report  
18 at Page 128?

19 A. Yes.

20 Q. Okay. And is this the paper that you  
21 were just referencing when you said, "We've been  
22 able to determine that there are neural  
23 vulnerabilities that make some adolescents more  
24 prone to problematic social media use"?

25 A. This was the example in the figure that

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1 I was using to describe that.

2 Q. Okay. Are there other -- and it's fine  
3 if the answer is no or you don't remember. But are  
4 there any other papers that you would point to to  
5 say that study also supports that specific point?

6 A. I think that this paper builds on a  
7 large body of literature; for example, linking  
8 related constructs, like substance use addiction in  
9 similar neural and -- neurobiological  
10 vulnerabilities to substance use onset. So it  
11 relies on a very large and robust body of  
12 literature.

13 Q. Well, I want to just make sure I  
14 understand your answer. The large body of  
15 literature that you're referring to are studies  
16 that address neurobiological vulnerabilities in  
17 connection with substance use addiction, right?

18 A. Yes, this builds upon that literature.

19 Q. Okay. And substance use addiction -- I  
20 just want to make sure we're clear about our terms  
21 here. Substance use addiction is a different thing  
22 than social media addiction, as you've described  
23 it?

24 A. They share --

25 MS. COUCH: Objection. Vague.

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1 Go ahead.

2 THE WITNESS: They share underlying  
3 neurobiological processes and systems in the brain,  
4 but they are distinct.

5 BY MS. JONES:

6 Q. And when you say, "They share  
7 underlying neurobiological processes," what are you  
8 referring to specifically?

9 A. I can refer specifically to the  
10 publication.

11 Q. You're looking at Flannery --

12 A. Yeah.

13 Q. -- in Exhibit 20? Okay.

14 A. I believe we reference this literature  
15 in here. If not, it's in my report.

16 Yeah. I think, for example, if you go  
17 to Page 6, the first full paragraph on the right:  
18 These results could suggest that some adolescents  
19 with premature elevations in neural social feedback  
20 sensitivity may initially be more sensitive to the  
21 delivery of social feedback via media. However,  
22 pubertal decreases in social feedback --

23 Q. Dr. Telzer, I bet the court reporter  
24 would appreciate you speaking a little bit slower  
25 would be my guess. That's my prediction.

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1 A. Sure. I apologize. I'll start the  
2 second -- the second sentence.

3 The -- however, observed pubertal  
4 decreases in social feedback in all of the regions  
5 identified here -- that's not quoted -- may reflect  
6 desensitization to such feedback, possibly through  
7 mechanisms similar to those driving tolerance  
8 buildup -- repeat -- sorry -- those driving  
9 tolerance buildup after repeated administrations of  
10 an addictive drug.

11 So that's one example of where we're  
12 sort of relying upon that similar neurobiological  
13 mechanism.

14 Q. Could I ask you a question about what  
15 you just read, Dr. Telzer?

16 A. Yes.

17 Q. I actually want to ask about the next  
18 sentence in that paragraph, which you didn't get to  
19 read.

20 It says: As we did not have data on  
21 participants' amount of social media exposure over  
22 pubertal development, this hypothesis could not be  
23 further explored in this sample.

24 Is that also true?

25 A. That's also true.

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1 Q. Okay. And then it goes on to say, just  
2 in fairness to your paragraph: Nonetheless, our  
3 findings indicate that developmental changes in  
4 brain function previously implicated in social  
5 information processing may be associated with  
6 individual differences in ASMU susceptibility.

7 A. Yes.

8 Q. And, again, the phrase "may be  
9 associated."

10 A. As I --

11 Q. Let me just ask --

12 A. Yeah.

13 Q. -- my question.

14 A. Okay.

15 Q. I had not yet gotten to my question.

16 A. Sorry.

17 Q. Does that intend to say that there is  
18 not yet an association that has been established?

19 A. Let me get back to that "may be." Our  
20 findings indicate -- may be associated --

21 (Reading to self.)

22 Again, we use the term "may be" to  
23 indicate probably, more likely than not, this is  
24 the effect that we found. We believe that there is  
25 a strong relationship between these two.

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1 BY MS. JONES:

2 Q. So this is another place where the  
3 words "may be" as written, in fact, in your telling  
4 today mean probably, more likely than not?

5 A. Yeah. We use the word "may be" to  
6 indicate that our findings are likely indicative of  
7 this.

8 Q. Okay. And -- but those words --  
9 "likely indicative of this," "probably," "more  
10 likely than not," those words don't appear either  
11 in this paragraph we've been looking at or anywhere  
12 in this article, do they?

13 A. I don't know about anywhere else in  
14 this article. These words, it does not -- it's not  
15 listed there.

16 Q. Let me ask you to go to, actually, the  
17 first page of the Flannery paper, which is -- we've  
18 marked as Exhibit Number 20.

19 And I want to ask you about the first  
20 part of your introduction, which says: Social  
21 media serves many functions and it is -- excuse me.  
22 Let me start over.

23 Social media serves many functions and  
24 is often a part of healthy adolescent development.

25 Did I read that correctly?

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1 A. Yes. Sorry.

2 Q. That's okay. And then it cites -- one,  
3 two, three -- four papers, yes?

4 A. Yes.

5 Q. Including another paper authored by  
6 your co-author, Dr. Flannery, correct?

7 A. Yep.

8 Q. Is that a true statement today still?

9 A. I --

10 MS. COUCH: Objection. Vague.

11 THE WITNESS: I -- as I indicated here,  
12 social media serves parts of healthy adolescent  
13 development. But as we go on to say: However,  
14 addiction-like social media use is becoming  
15 increasingly reported.

16 BY MS. JONES:

17 Q. Sure. My question was, simply: Is  
18 that statement that social media serves many  
19 functions and often is part of a healthy adolescent  
20 development, is that still true today?

21 MS. COUCH: Asked and answered.

22 THE WITNESS: Social media, as  
23 indicated in this paragraph here, may serve some  
24 parts of healthy development, but that does not  
25 negate the many negative effects.

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1 And, in fact, the negative effects  
2 significantly outdo any positive effects, and  
3 especially when it comes to something like  
4 addiction-like social media use.

5 BY MS. JONES:

6 Q. Is that -- the -- the kind of  
7 benefits-negative effects weighing that you've  
8 talked about today --

9 A. Uh-huh.

10 Q. -- is that -- does that weigh out the  
11 same way for every adolescent or teenager?

12 MS. COUCH: Objection. Vague.

13 THE WITNESS: I don't think I should  
14 speculate on that.

15 BY MS. JONES:

16 Q. Well, I'm just trying -- I'm just  
17 trying to understand if your ultimate opinion is  
18 that for every adolescent or teenager, that the use  
19 of social media and any healthy or beneficial  
20 effects would be outweighed by negative effects.

21 MS. COUCH: Objection. Vague.

22 BY MS. JONES:

23 Q. Do you believe that's the case for  
24 every adolescent or teenager?

25 MS. COUCH: Same objection.

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1 THE WITNESS: I believe that the risks  
2 and harms of social media outdo any benefits that  
3 there could be. I can't speak to any individual  
4 adolescent.

5 BY MS. JONES:

6 Q. Are you -- is it possible that for some  
7 adolescent or teenager, the benefits might outweigh  
8 what you have described as potential harms from  
9 social media use?

10 A. I can't speak to any individual  
11 adolescent and the weight of those things. I  
12 think, at the larger scale, the harms are extreme  
13 and outdo any potential small benefit that social  
14 media could provide.

15 Q. Did -- did you comprehensively, as part  
16 of your work as an expert in this case, evaluate  
17 the benefits of social media so that you could  
18 actually do this weighing that you're describing  
19 across all teenagers?

20 A. I do research in my lab on the benefits  
21 of social media. I am not negating that those  
22 don't exist. But the harms are so extreme that we  
23 don't need to do any singular calculation.

24 It's just a very clear pattern that  
25 these harms are so harmful that it is not safe to

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1 be on social media for an adolescent.

2 Q. And would you say the same thing for  
3 an -- a teenager who's 14 versus 16?

4 MS. COUCH: Objection.

5 THE WITNESS: I can't speculate on a  
6 14-year-old versus a 16-year-old, no.

7 BY MS. JONES:

8 Q. You don't know whether that  
9 harm-versus-benefit calculus would be different as  
10 a teenager gets older?

11 MS. COUCH: Objection. Calls for  
12 speculation.

13 THE WITNESS: There -- it's possible  
14 that a 14-year-old is more at risk than a  
15 16-year-old, and it's possible that another  
16 16-year-old is more at risk than a 14-year-old. I  
17 can't make that claim based on a speculative age  
18 cutoff.

19 BY MS. JONES:

20 Q. Because every teenager is different,  
21 yes?

22 A. There are differences in adolescents.  
23 And I talk about individual differences.

24 Q. Yeah. You -- is one of your opinions  
25 in this case that the risks at a kind of population

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1 level, all-teenager level, that the risks of social  
2 media always outweigh the benefits of social media?

3 A. I don't think I've expressed that as  
4 one of my summary opinions.

5 Q. Okay. So that's not an opinion that  
6 you've offered in this case?

7 A. I'm not making a -- I'm not weighing  
8 those two things in my opinions.

9 Q. Okay. And part of the reason you  
10 couldn't do that weighing, I suspect, is that you  
11 did not, it didn't sound like, actually do any work  
12 to gather what the data and the literature say on  
13 the benefits of social media for adolescents and  
14 teens, right?

15 MS. COUCH: Objection. Misstates her  
16 testimony and her materials list.

17 THE WITNESS: I have looked at the  
18 benefits of social media. I have not said that  
19 those don't exist.

20 But from my review of all the  
21 literature, from my work in the field, from talking  
22 to parents about their concerns, from meeting with  
23 teens and conducting my own research, I have come  
24 to the conclusion that social media is harmful.

25 BY MS. JONES:

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Q. Well, that -- that part I understand.

I guess -- I thought, when we talked about this earlier, you said that you hadn't done a systematic literature search on the benefits of social media for teenagers because you didn't view that as being within the scope of what you were doing for purposes of your opinions. Is that right?

MS. COUCH: Objection. Misstates her testimony.

THE WITNESS: No. I said that I did not include that as part of the report that you were asking about.

BY MS. JONES:

Q. So you -- you considered the benefits, but you didn't say anything about the benefits in your written report?

MS. COUCH: Objection. Misstates the report.

THE WITNESS: I believe I have mentioned the benefits of social media in my report.

BY MS. JONES:

Q. You think you have a section in that report about the benefits of social media?

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A. I think I have mentioned the benefits of social media in here. But my general opinion is based on all of the other literature that I have included in here.

Q. I'm curious. Is there a specific thing you're thinking of in your report where you acknowledge the benefits of social media for teenagers?

A. I can't identify a specific sentence off the top of my head, but I believe it's at least mentioned.

Q. Okay. But you don't know where?

A. Okay.

Q. If I ran a control F search in your report for the word "benefit," would I find it?

A. I believe so.

Q. Okay.

MS. COUCH: Twenty-six times.

MS. JONES: Okay.

BY MS. JONES:

Q. In those instances, would you be weighing it?

MS. JONES: Counsel, you shouldn't be testifying for the witness --

MS. COUCH: Sorry.

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MS. JONES: -- obviously. I know it's hard to resist the impulse.

BY MS. JONES:

Q. Did you explicitly lay out what the benefits of social media are for teenagers and adolescents?

A. I -- my --

Q. Now that your counsel has told us you mentioned it 26 times, what did you say about them?

A. I can't recall what I said about it.

Q. When you come to trial and testify, or if you come to trial and testify, are you going to acknowledge to the jury that there are, in fact, benefits of using social media for teenagers?

MS. COUCH: Objection. Calls for a legal response and speculation.

THE WITNESS: I can't speculate about the future.

BY MS. JONES:

Q. Okay. But you'll testify truthfully if you come to testify at trial, right?

A. I will tell the truth if it comes to coming.

Q. Okay. Okay. I mean, since we're just talking, I'm told that the references to benefits

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in your report are about benefits of study design, not benefits of social media.

With that clarification, do you think that you have references to the benefits of social media in that report?

A. I can't tell you off the top of my head. I believe I have mentioned the benefits of social media.

That being said, the purpose of my report is not to talk about the benefits but to lay out the very explicit harms and how social media is related to changes in the developing brain.

Q. Dr. Telzer, on Page 3 of -- of Exhibit Number 20, which is the Flannery 2024 -- excuse me -- Flannery -- I think it is 2024 --

A. Uh-huh.

Q. -- paper on which you were a co-author, if you turn to Page 3, there is a section entitled -- well, there's a section called "Measures."

Do you see that?

A. Yes.

Q. And then there's another section entitled "Addiction-like Social Media Use Symptoms."

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1 Do you see that?

2 A. Yes.

3 Q. And was that the measure that you used

4 in terms of evaluating potential problematic use or

5 addictive use symptoms, ASMU?

6 A. Yes.

7 Q. And in your reference here, it says on

8 Page 3: ASMU symptoms were also measured at the

9 final time point with a novel seven-item

10 questionnaire. Right?

11 A. Yep.

12 Q. And in that setting, "novel" means what

13 exactly?

14 A. For the purposes of this study, we

15 developed this measure.

16 Q. Okay. Is it used elsewhere?

17 MS. COUCH: Objection.

18 THE WITNESS: This is a -- a very

19 similar measure to many of the other social media

20 addiction measures that are also based on the

21 "Diagnostic and Statistical Manual" for substance

22 use.

23 BY MS. JONES:

24 Q. Okay. But my question was: Is ASMU

25 used elsewhere that you know of?

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1 MS. COUCH: Objection. Vague.

2 THE WITNESS: What do you mean by "is

3 ASMU used elsewhere"?

4 BY MS. JONES:

5 Q. Like, in -- in studies on which you

6 were not a co-author, could I find other studies

7 that use ASMU?

8 A. Do you mean the acronym "ASMU"?

9 Q. Well, not ASMU, but the -- the specific

10 questionnaire, the novel seven-item questionnaire

11 that you used in this study, the Flannery 2024

12 paper.

13 A. No. Other studies have not used this

14 specific measure.

15 Q. Okay. Is this study the one place that

16 that novel seven-item questionnaire has been used?

17 A. We've used it in other publications.

18 Q. And by "you," you mean yourself and

19 some of your co-authors?

20 A. Yes.

21 Q. So, Dr. Telzer, you -- by the time

22 you -- this is February of 2024, yes? Accepted

23 February 20 -- 2024? Down at the bottom of the

24 page on the first page?

25 A. Yes.

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1 Q. Okay. And this journal does have a

2 conflict of interest section in it, right? On

3 Page 8.

4 A. Yes.

5 Q. And there is some discussion of things

6 that were declared. It says: The authors declare

7 the following financial interests/personal

8 relationships which may be considered as potential

9 competing interests.

10 Do you see that?

11 A. Yes.

12 Q. And it says that you and Dr. -- you and

13 Dr. Prinstein reported receiving private research

14 funds from the Winston Family Foundation during the

15 conduct of the study. Correct?

16 A. Correct.

17 Q. Now, by February of 2024, you had been

18 retained by Mr. Bergman, correct?

19 A. Yes.

20 Q. Had you been yet introduced to, I

21 guess, the group that you think of as the MDL

22 lawyers in this litigation?

23 A. Not that I can recall, no.

24 Q. When -- when you were -- without

25 telling me about your specific conversations, when

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1 you were retained by Mr. Bergman, did you

2 understand that he was a lawyer representing a

3 party in a lawsuit?

4 A. I don't think I understood that at that

5 time.

6 Q. Did you know he was a lawyer?

7 A. I knew he was a lawyer.

8 Q. And by the time this article was

9 published in February of 2024, you'd been -- you

10 had been paid by Mr. Bergman, right?

11 A. I think for a few initial meetings.

12 Q. Okay. And if you need to, you can look

13 back at what we've marked as Exhibit Number 3.

14 MS. COUCH: Can I just object to it's

15 misleading because it says it was received in '23.

16 MS. JONES: You can object, but you may

17 not coach the witness by testifying yourself.

18 So your objection is noted. The rest

19 is inappropriate.

20 BY MS. JONES:

21 Q. Do you have Exhibit 3 in front of you?

22 A. Yes, I do.

23 Q. All right. And if you flip through

24 Pages 1, 2, 3 of Exhibit 23 -- excuse me -- Exhibit

25 Number 3, those were the invoices that were related

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1 to a period where you were just working with  
2 Mr. Bergman, correct?

3 A. Yeah.

4 Q. You did not, as part of your disclosure  
5 in -- and by that time, you had -- by the time this  
6 paper was submitted, you had been -- you had at  
7 least invoiced Mr. Bergman for some amount of money  
8 in whatever consulting role you were playing,  
9 correct?

10 A. That's correct.

11 Q. Did you --

12 MS. COUCH: Objection. Misstates the  
13 documents, both of them.

14 MS. JONES: Well, she's already  
15 testified and said it was correct.

16 MS. COUCH: I'm sure we wouldn't want  
17 an inaccurate record.

18 MS. JONES: Well, you're not -- you're  
19 not allowed to make the record accurate by  
20 testifying yourself.

21 BY MS. JONES:

22 Q. By the time that you --

23 MS. COUCH: The date says June 9th and  
24 June 20th.

25 MS. JONES: Counsel. Counsel, you are

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1 not -- this is inappropriate. This is not even a  
2 speaking objection. This is just you testifying,  
3 which is not your role.

4 BY MS. JONES:

5 Q. Dr. Telzer, by the time that this paper  
6 was published, you did, in fact, have a financial  
7 relationship with Mr. Bergman, correct?

8 A. By the time the paper was published in  
9 '24, I had had conversations with Mr. Bergman.

10 Q. Okay. Conversations that you  
11 eventually billed him for, right?

12 A. Those were billed.

13 Q. Okay. And you -- you did not disclose  
14 a conflict of interest with respect to this paper  
15 in 2024 -- that was published in 2024?

16 A. I did not. And at the time, I did not  
17 understand the scope of my work nor what this was  
18 sort of leading to in the -- the grander scheme  
19 of -- of this case.

20 Q. Did you -- did you understand, again,  
21 generally, that you were consulting on the topic of  
22 alleged social media addiction in teenagers?

23 MS. COUCH: Objection. Speaks to  
24 attorney communications.

25 BY MS. JONES:

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1 Q. You didn't know.

2 MS. JONES: -- -expert communications.

3 BY MS. JONES:

4 Q. You're shaking your head "no."

5 A. No. I think I partly can't speak to  
6 that and partly don't -- didn't understand yet what  
7 the broader scope of this was.

8 Q. And your testimony is that the reason  
9 that you didn't disclose that is because you didn't  
10 know what you were doing with Mr. Bergman at that  
11 point?

12 A. In part, I didn't yet understand. And,  
13 in part, it's perhaps an oversight and it should be  
14 in here.

15 Q. Okay.

16 A. And that's fine. I can look into it.

17 Q. In your report, you -- and you've said  
18 this at various points during your testimony today.  
19 You have included discussions of the term  
20 "problematic use or addiction-like use," right?

21 A. Yes.

22 Q. And one of the things that you have  
23 said -- and you can look at Page 189 of your  
24 report, if you want to refer to it -- is that:  
25 Problematic or addictive use of social media is

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1 well-recognized within the literature and supported  
2 by neuroscience.

3 A. Sorry. What page?

4 Q. 189. It's in your conclusion.

5 A. I'm sorry. I'm not seeing it. Oh.  
6 It's -- well -- yeah. I see it now.

7 Q. If you go to Page 124 of your report,  
8 there's a section entitled, about midway down, that  
9 says, 11.3, "Problematic social media use."

10 Do you see that?

11 A. Yes.

12 Q. And you write: In the literature,  
13 problematic social media use is characterized by  
14 excessive, compulsive, and poorly regulated  
15 engagement with social media that interferes with  
16 daily functioning and well-being.

17 Did I read that correctly?

18 A. Correct.

19 Q. And it goes on to say: It shares  
20 features with behavioral addictions, including  
21 substance use addiction.

22 Do you see that?

23 A. I do.

24 Q. And you -- that was -- that's a  
25 comparison that you drew in the Flannery paper that

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1 we were just talking about, right?

2 A. I did.

3 Q. And you actually acknowledged in the  
4 Flannery paper that you all were not able to test  
5 that specific hypothesis as part of that work,  
6 right?

7 MS. COUCH: Objection. Misstates the  
8 paper.

9 THE WITNESS: I think that there was a  
10 caveat in that paper that -- in the limitations  
11 section.

12 BY MS. JONES:

13 Q. Okay.

14 A. That does not necessarily refer to  
15 this.

16 Q. It goes on to say: In order to  
17 understand the rate of problematic social media use  
18 in our cohort of adolescents, we adapted items from  
19 the Diagnostic Statistical Manual (DSM-5; American  
20 Psychiatric Association) substance use disorder  
21 checklist, whereby we replaced the wording for  
22 substance use for social media use.

23 A. Yep.

24 Q. Do you see that?

25 And just to be clear, the DSM-5 is the

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1 diagnostic manual recognized -- excuse me -- the  
2 diagnostic manual of recognized mental disorders  
3 published by the American Psychiatric Association?

4 A. That's what that is.

5 Q. And, just generally speaking, it  
6 provides a standardized means of classifying and  
7 diagnosing psychiatric disorders; is that right?

8 A. I believe that's one way in which it's  
9 used.

10 Q. Do you understand that DSM-5 -- excuse  
11 me. Do you understand the DSM to be the  
12 authoritative source for assessment and diagnosis  
13 of psychiatric disorders?

14 A. I don't think that it --

15 MS. COUCH: Objection. Foundation.  
16 Continue.

17 THE WITNESS: I don't think it's the  
18 single authority, no.

19 BY MS. JONES:

20 Q. What other authorities do you believe  
21 are routinely used by experts in the field in  
22 diagnosing psychiatric disorders?

23 A. I think there are many measures and  
24 scales used by clinicians and medical doctors in  
25 the field.

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1 Q. Are there any in particular that you're  
2 thinking of?

3 A. Not off the top of my head, I am not,  
4 no.

5 Q. Now, the DSM-5 actually does recognize  
6 some behavioral addictions; is that right?

7 A. Some what addictions? Behavioral?

8 Q. Behavioral. Excuse me. Yes.

9 A. Yes, I believe so.

10 Q. Okay. So, for example, gambling  
11 addiction is a recognized behavioral addiction in  
12 the DSM-5, right?

13 A. Yes, it is.

14 Q. And I assume you know and would  
15 acknowledge the DSM-5 does not recognize social  
16 media addiction?

17 A. I think that there is a plethora of  
18 other substantial health care providers and broader  
19 groups, including the American Psychiatric -- or  
20 American Psychological Association that's put out  
21 broad statements about agreeing that social media  
22 addiction is a real thing and we should be  
23 concerned about it.

24 MS. JONES: Okay. I'm going to move to  
25 strike as nonresponsive.

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1 BY MS. JONES:

2 Q. My question was: I assume you know and  
3 would acknowledge that the DSM-5 does not recognize  
4 social media addiction?

5 A. The DSM-5 at this point has not yet  
6 been updated to include social media addiction.

7 But it is not the sole indicator of  
8 diagnostic criteria, and there are many others in  
9 the field who acknowledge and have put forth  
10 presentations and statements that social media  
11 addiction is a real thing, including the U.S.  
12 Surgeon General, the American Psychological  
13 Association, and others as well.

14 Q. Do you -- now, I think you told me  
15 earlier --

16 MS. JONES: And I'm going to move to  
17 strike everything after the first reference to  
18 social media addiction.

19 BY MS. JONES:

20 Q. You told me earlier you are not  
21 yourself, as part of what you do, qualified to  
22 diagnose individuals with any condition, whether  
23 it's some form of addiction or some other mental  
24 health disorder, right?

25 A. I'm not a clinician who diagnoses

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1 mental disorders.

2 Q. Okay. And in terms of determining  
3 which diagnostic criteria are most appropriate for  
4 a particular condition, is that something that you  
5 ever do in your work as an academic researcher?

6 A. As an academic researcher, I'm talking  
7 to and engaging with clinicians and psychologists  
8 all the time.

9 My work informs diagnostic criteria  
10 used in their practices. Their experiences inform  
11 the way that I do my research and informs how we  
12 ask different questions.

13 Q. Sure. And I understand you work with  
14 people who might be trained to determine what is  
15 the best diagnostic criteria for diagnosing  
16 individuals.

17 My question for you was: Are you a  
18 person who, as part of your day-to-day work, is  
19 responsible for making judgments about what  
20 diagnostic criteria appropriately apply to a  
21 particular condition?

22 MS. COUCH: Asked and answered.

23 THE WITNESS: I am not a clinician who  
24 makes these diagnoses. But I interact with, work  
25 with, collaborate with psychiatrists and clinicians

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1 all the time.

2 So my work informs them, and they are  
3 oftentimes the ones making those kinds of  
4 decisions.

5 BY MS. JONES:

6 Q. Are -- are there -- are there specific  
7 people you're thinking of when you say, "My work  
8 informs clinicians' diagnostic decisions with  
9 respect to the care of folks who might have  
10 addiction or mental health disorders"?

11 A. I mean, it's large group of people.  
12 But I have therapists, for example, calling me,  
13 asking for my expertise on this topic, regularly.

14 Q. They call you and ask you specifically  
15 about what is the best diagnostic criteria to use  
16 in a particular circumstance?

17 A. We have discussions broadly about what  
18 the research is showing so that that research can  
19 inform their decisions in their clinical work.

20 Q. Okay. But they -- you don't have  
21 clinicians who call you and say, "Dr. Telzer, I  
22 have someone I'm caring for. I want your advice on  
23 which diagnostic criteria I should be using with  
24 this patient"?

25 A. I don't advise about a specific or

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1 particular client or patient.

2 But we have conversations all the time  
3 about how the work that I'm doing can inform their  
4 clinical practice and how their conversations that  
5 they're having with their -- their patients and the  
6 patterns that they're seeing can inform the  
7 questions that we ask in our research.

8 Q. There -- is there any accepted set of  
9 diagnostic criteria for assessing either social  
10 media addiction, which you've described as social  
11 media addiction, problematic social -- social media  
12 use, or addiction-like social media use?

13 MS. COUCH: Compound.

14 MS. JONES: Well, that's a fair  
15 objection. Let me -- and not a speaking objection.  
16 A form objection.

17 BY MS. JONES:

18 Q. Let me ask you a more broken-down form.

19 Is there any accepted set of diagnostic  
20 criteria for -- for assessing whether someone has  
21 social media addiction?

22 A. You know, not as somebody who's  
23 engaging in diagnoses or looking at these criteria.

24 I can say more broadly that there are  
25 lots of validated measures that are used to capture

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1 social media addiction, and I think that clinicians  
2 are using those types of validated scales.

3 Q. What -- what type of measures are you  
4 thinking of specifically?

5 A. There's a -- a handful of social media  
6 addiction scales out there going back to 2012.  
7 More recently, scales coming out.

8 Q. And you said, "I think that clinicians  
9 are using those types of validated scales."

10 Is that based on clinicians actually  
11 telling you, "I have used this scale with a patient  
12 to see if the patient has social media addiction"?

13 A. Sorry. You're asking me to speculate,  
14 so I'm speculating.

15 Q. Well, let me ask you a more specific  
16 factual question. I think you were speculating in  
17 your answer, but now I actually just want to ask  
18 factually.

19 Have you ever had a -- a clinician who  
20 said to you, "I am using a validated scale to  
21 determine whether a teenager has social media  
22 addiction"?

23 A. I haven't had conversations about  
24 specific clients or teenagers in their practice.

25 We more generally are talking about the

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work that I'm doing and how that can inform their understanding of these patterns and how their experiences broadly of being exposed to youths with problematic social media use can inform the questions that we're asking.

Q. Okay. Let me ask you a slightly different question.

Putting aside whether it was any individual patient, have you had a clinician say to you, "I have used a validated scale to evaluate whether my patients, teen patients, have social media addiction"?

A. I can't recall.

Q. Are you aware of any specific validated scale for assessing social media addiction that is used at UNC?

A. I don't know what people at UNC use per se. This is sort of out of the scope of the opinions I have here. I'm speculating now about what others are doing. I don't know how that's --

Q. I think the way this started is that you said, "I think clinicians are using these validated scales."

A. Yeah, you asked -- sorry.

Q. So I'm -- I'm just trying to follow up

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on what you actually know, putting aside what you might have a general impression of.

Are you aware of any clinician at UNC, your institution, who uses a validated scale for evaluating whether teenagers have social media addiction?

MS. COUCH: Asked and answered.

THE WITNESS: You've asked me to speculate. I speculated that I think there are. I can't tell you a specific example.

BY MS. JONES:

Q. You think there are, but you can't tell me a specific example?

A. I've had lots of conversations with clinicians at UNC, also at -- many more outside of UNC as well, so...

Q. And I guess my -- I'm not asking you to speculate. But I want to make sure that if you are speculating that we at least are clear about that.

It sounds like you are not aware of a specific scale for social media addiction that is being used at UNC.

MS. COUCH: Asked and answered.

THE WITNESS: As I indicated, I don't know what specific clinicians or doctors at UNC are

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doing. But we have had lots of conversations about the use of these scales.

I collaborate with a lot of clinicians in psychology, in psychiatry as well, and these types of conversations happen regularly.

Therapists call me up to talk about social media addiction. I don't know of what they are specifically doing in their practice.

BY MS. JONES:

Q. What about problematic social media use, which is another term you've used? Is there an accepted set of diagnostic criteria for problematic social media use?

A. I mean, these are broadly accepted in the academic literature. I'm not a clinician. I don't know exactly what clinicians are doing in their practices.

Q. When you say "broadly accepted in the academic literature," I'm not sure what that means exactly. That someone wrote an article about something?

A. There's lots of literature referring to problematic social media use. There have been calls put out by the APA and others referring to problematic social media use.

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Myself, I use problematic social media use in a way to discuss addiction, social media addiction. Whether one uses one word or another, I can't necessarily disentangle that for you.

Q. I suspect your answer is going to be the same as to my earlier question. But are you aware of any clinicians at UNC who are using any kind of scale or diagnostic criteria to diagnose teenagers with problematic social media use?

A. I don't know what the clinicians are doing in their practices.

Q. Have you ever had a clinician at UNC call you up about something described as "problematic social media use"?

A. I can't recall.

Q. Is that a term that you've ever had one of your clinical colleagues use with you?

A. I can't recall.

Q. Okay. Sitting here today, you just don't know if that's ever happened?

A. I can't recall the specific terminology that was -- was used.

Q. Okay. Same question as to -- the phrase that you use in your report is "addiction-like social media use."

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Are there any accepted diagnostic criteria for assessing whether a teenager has addiction-like social media use?

A. The answer is similar to all of the others. There are these well-validated, well-used scales out there. I can speculate that clinicians are using them. I don't know.

The -- the research that we do and write about is read by clinicians, so I can assume that it informs their work.

Q. I heard the words "speculation" and "assumption," and I'll come back to that.

But were you -- is your testimony that there are validated -- well-validated, well-used scales for addiction-like social media use?

A. No. I -- I'm not saying that there's a well-validated -- well-validated scale for that specific phrase.

Q. Okay. And have you ever had any clinician at UNC, or anywhere, for that matter, talk to you about something described as "addiction-like social media use"?

A. I can't recall.

Q. Did -- did you know that the DSM-5, there had actually been a specific consideration of

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whether to include social media addiction in the DSM-5, and there was a decision not to include it because of insufficient peer-reviewed evidence to establish social media addiction?

MS. COUCH: Objection. Lacks foundation.

THE WITNESS: I'm not sure if I know that about how the DSM was created.

BY MS. JONES:

Q. You never -- well, I'm not asking you about how the DSM was created.

I'm asking specifically: Did you know that the -- the folks responsible for the DSM-5 had actually specifically considered whether to include social media addiction and determined not to do that because there was insufficient peer-reviewed evidence to establish social media addiction as a recognized behavioral disorder?

MS. COUCH: Objection. Lacks foundation.

THE WITNESS: I'm not aware of that specific quote or when that was indicated.

BY MS. JONES:

Q. Okay. So that was -- are you hearing that for the first time today, if it -- if it did

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happen?

A. I'm not sure. But my broader understanding of social media addiction does not come from just the DSM-5 but from all of the literature at large.

From a handbook that I co-edited that has an entire chapter on social media addiction. The broader academic field definitely recognizes social media addiction is a real thing. So I have no doubt that the foundational research is there.

There have been calls put forth by the American Psychological Association, by the Surgeon General of the United States, stating that social media addiction is a problem.

Q. Is it relevant to you -- would it be relevant to you if the American Psychiatric Association had considered whether to include social media addiction in the DSM-5 and had declined to do it?

MS. COUCH: Objection. Lacks foundation.

THE WITNESS: That does not change my understanding or opinion here.

From the broader literature, from tons of publications, from the handbook that I co-edited

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with an entire chapter on social media addiction, this is a -- this is a true and problematic thing that exists.

Social media addiction is a real thing. I don't need the Diagnostic Statistical Manual to tell me that for me to know.

BY MS. JONES:

Q. You -- you relied -- and when you say, "Social media addiction is a real thing and I don't need the DSM-5 to tell me that to know," just to be clear, that statement is not based on any actual experience treating patients with any kind of psychiatric disorder, right?

MS. COUCH: Asked and answered.

THE WITNESS: I don't -- I don't clinically treat patients.

BY MS. JONES:

Q. Okay. And this is probably implicit in what we already discussed. But the phrases "problematic social media use" and "addiction-like social media use," those are nowhere in the DSM-5, right?

A. Not that I know of.

Q. Did you look?

A. Those terms I don't believe are in the

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1 DSM-5.

2 Q. Well, my question was: Did you look --

3 MS. COUCH: Objection. Asked and  
4 answered.

5 BY MS. JONES:

6 Q. -- as part of your work in this case?

7 A. I don't review the Diagnostic  
8 Statistical Manual.

9 Q. Now, you based your seven-question  
10 scale from the Flannery paper, if I'm recalling  
11 your papers correctly, on the DSM-5, right?

12 A. We pulled out the items from that  
13 measure on substance use.

14 Q. So, in that instance, you did consider  
15 the DSM-5, yes?

16 A. We used substance use disorder  
17 checklist to transform that phenomenon of substance  
18 use disorder into a very relevant thing for us in  
19 the context of social media addiction.

20 Q. Okay. So you -- you used something  
21 that the DSM-5 had recognized to create a scale or  
22 a tool for something that the DSM-5 has not  
23 recognized?

24 MS. COUCH: Objection. Vague.

25 THE WITNESS: We used the substance use

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1 disorder checklist and used those items to look at,  
2 similar to how many other social media addiction  
3 scales have been developed relying on the  
4 Diagnostic Statistical Manual, items for substance  
5 use disorder, social media addiction.

6 BY MS. JONES:

7 Q. Do you agree that just because a  
8 teenager uses a social media platform, that does  
9 not mean that the teenager is experiencing social  
10 media addiction?

11 A. I can agree with the broad concept that  
12 just because one uses social media does not mean  
13 you are addicted.

14 Q. I -- I suspect your answer is going to  
15 be that this is outside what you typically do.

16 But are you aware of any adolescent or  
17 teenager who has been diagnosed with social media  
18 addiction?

19 A. I have talked to a lot of adolescents  
20 who self-identify as addicted to social media. I  
21 don't know -- it's probably protected -- whether  
22 they have been diagnosed by a clinician.

23 Q. And self-diagnosis -- and I say this as  
24 a person who always thinks I have some dreaded  
25 disease, so I'm not picking on people.

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1 But self-diagnosis is not a fully  
2 reliable way of knowing whether someone actually  
3 has a clinical condition, right?

4 MS. COUCH: Objection. Misstates her  
5 testimony.

6 THE WITNESS: I regularly interact with  
7 adolescents, ranging from informal meetings to --  
8 we have a teen advisory board, for example, who  
9 helps us understand concepts and how they affect  
10 them in their everyday lives, to doing the research  
11 that we do where we ask adolescents to -- as  
12 included in my report, we ask them their  
13 self-report: Do you think you are addicted to  
14 social media?

15 And adolescents are reporting high  
16 levels of social media addiction based on those  
17 discussions and data that we've collected.

18 MS. JONES: And I'm -- I'm going to  
19 move to strike, again, respectfully, as  
20 nonresponsive.

21 BY MS. JONES:

22 Q. My question was: Can we agree in  
23 general terms that self-diagnosis is not a fully  
24 reliable way of knowing whether somebody has a  
25 clinical condition or not? Right?

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1 MS. COUCH: Asked and answered. Vague.

2 THE WITNESS: As I mentioned, I talk to  
3 adolescents all the time in many different  
4 contexts.

5 We have both informal discussions as  
6 well as discussions based on a teen advisory board,  
7 and very rigorous -- rigorously conducted research,  
8 where we conduct self-report measures that are very  
9 strongly supporting the premise that a high  
10 percentage of adolescents are reporting high levels  
11 of social media addiction.

12 BY MS. JONES:

13 Q. Other than the -- these self-reports of  
14 social media addiction that you have just  
15 described, just to go back to my original question,  
16 are you aware of any teenager who has been  
17 diagnosed by a clinician with social media  
18 addiction?

19 A. I've talked to lots of adolescents who  
20 tell me that they are addicted to social media. I  
21 don't have the knowledge of their therapists'  
22 diagnoses.

23 Q. Okay. Can -- can you agree with me  
24 that there are millions of individuals, including  
25 teenagers, who use social media without

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1 experiencing any psychological harm?

2 MS. COUCH: Objection. Vague.

3 THE WITNESS: I don't think I can  
4 speculate on that number.

5 BY MS. JONES:

6 Q. Well, let me take the numbers out of  
7 it. Do you agree with me that there are teenagers  
8 who use social media who do not experience mental  
9 health injury or harm?

10 A. I agree with --

11 MS. COUCH: Objection. Vague.

12 THE WITNESS: Sorry.

13 I agree with the premise that there are  
14 adolescents who use social media who do not all  
15 have harm.

16 BY MS. JONES:

17 Q. And do you also agree that there are  
18 adolescents and teenagers who use social media who  
19 do not develop any form of addiction to social  
20 media?

21 A. I can agree with the general premise  
22 that there is some adolescents who do not develop  
23 social media addiction.

24 MS. COUCH: Can we take a five-minute  
25 bathroom break since you're grabbing a new

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1 document?

2 MS. JONES: Yes, of course. That's  
3 fine.

4 MS. COUCH: Okay. Thank you.

5 THE VIDEOGRAPHER: Going off the  
6 record. The time is 5:26 p.m.

7 \* \* \*

8 (Whereupon, there was a recess in the  
9 proceedings from 5:26 p.m. to 5:37 p.m.)

10 \* \* \*

11 THE VIDEOGRAPHER: Going back on the  
12 record. The time is 5:37 p.m.

13 BY MS. JONES:

14 Q. Dr. Telzer, welcome back. A few  
15 times -- I wanted to just follow up on one quick  
16 thing.

17 A few times in your testimony today,  
18 you have used the phrase "more likely than not."

19 Do you recall that?

20 A. Uh-huh.

21 Q. You have to say "yes" or "no."

22 A. Yes. Sorry.

23 Q. And you have said that in the context  
24 of potential relationships between social media use  
25 and either brain changes, developmental --

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1 A. Uh-huh.

2 Q. -- changes or mental health harms,  
3 correct?

4 A. I don't know when I specifically said  
5 it.

6 Q. That's all right.

7 A. Sorry.

8 Q. That's fine.

9 A. Okay.

10 Q. My real question was: Is the phrase  
11 "more likely than not" a phrase that you use in  
12 your day-to-day work as an academic researcher?

13 A. It's not necessarily a common phrase  
14 that we use in publications. It is my way of  
15 expressing to you what I mean when I say "may."

16 Q. And does "more likely than not" mean  
17 greater than 50/50?

18 A. I can't give you a percentage for that.

19 Q. Okay. What does "more likely than not"  
20 mean to you?

21 A. It means that we have -- it means that  
22 we are confident that there's a meaningful effect  
23 of what I'm talking about.

24 Q. And is -- is "more like" -- putting  
25 aside whether it's something you put in your own

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1 publications, is it a -- a phrase that is used in  
2 science generally, in your experience?

3 A. I'm not sure if it's used in science  
4 generally.

5 Q. Okay. Have you seen it used in other  
6 settings of scientific or academic research?

7 A. I can't recall from science. I was  
8 using it here sort of as a "also known as," AKA.  
9 When I say "may," I mean "more likely than not."

10 What I mean is "probably." These are  
11 the words that I'm using here to help you  
12 understand what I mean by "may."

13 Q. Okay. In circumstances where you  
14 didn't say "more likely than not" in the article  
15 itself, right?

16 A. I was using that as an example of what  
17 I mean when I say "may" in those particular places  
18 that we talked about.

19 (TELZER EXHIBIT 21, Journal of Children  
20 and Media - U.S. adolescents' daily social media  
21 use and well-being: Exploring the role of  
22 addiction-like social media use, was marked for  
23 identification.)

24 BY MS. JONES:

25 Q. I'm handing you what we've marked as

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1 Exhibit Number 21. Have you -- do you recognize  
2 Exhibit Number 21, Dr. Telzer? And you're, of  
3 course, welcome to flip through it.

4 A. Yes.

5 Q. Exhibit Number 21 is another article  
6 that you have co-authored in this case, including  
7 with Dr. Burnell, your colleague at UNC, correct?

8 A. Correct.

9 Q. And Dr. Burnell is one of the persons  
10 that you mentioned who had helped in some of your  
11 work related to your role as an expert in this  
12 case, right?

13 A. Dr. Burnell is a research assistant  
14 professor in the Winston Center who I collaborate  
15 with.

16 Q. Okay. And this article was published  
17 in 2025; is that right?

18 A. Yes.

19 Q. If you look at the upper left-hand  
20 corner.

21 A. Yes.

22 Q. And you -- you do, I believe, refer to  
23 this paper in your report, if I'm recalling  
24 correctly.

25 A. I do discuss this paper in the report.

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1 Q. Let me -- I want to ask you about a few  
2 things that are in this paper, starting with,  
3 actually, the very first paragraph.

4 Now, this was published in 2025, which  
5 is a year we're just a little bit into.

6 Is this -- would you describe this, at  
7 least with respect to the topics that are reflected  
8 in this paper, a recent articulation of your views?

9 MS. COUCH: Objection. Vague.

10 THE WITNESS: I would say that the --  
11 this publication, if we look at the data and  
12 results and the way that I've described it here,  
13 those are accurate, yeah.

14 BY MS. JONES:

15 Q. Is there any portion of this study  
16 where you would say -- or this paper where'd you  
17 say, "Actually, that doesn't reflect my view  
18 anymore"?

19 MS. COUCH: Objection. Vague.

20 BY MS. JONES:

21 Q. If you know.

22 A. I think that the collective of this  
23 paper reflects the general findings that we found  
24 here in this paper.

25 Q. Okay. And starting with the very

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1 introductory paragraph, it says: Concern about the  
2 effects of social media use on youth mental health  
3 has resulted in legislative efforts holding social  
4 media companies responsible for the impact of their  
5 product.

6 Did I read that correctly?

7 A. Uh-huh.

8 Q. You have to say "yes" or "no."

9 A. Yes.

10 Q. And then the next sentence refers  
11 to what you describe -- you and your co-authors  
12 describe as: targeting addictive features and  
13 binding [sic] companies to engage in risk  
14 assessments of potential negative effects.

15 Did I read that correctly?

16 A. You left out a word, but otherwise --

17 Q. All right. It was not intentional. I  
18 apologize. Okay. It was actually the next  
19 sentence that I wanted to ask you about.

20 You -- you and your co-authors go on to  
21 say in this paper from 2025: Research examining  
22 associations between social media use and mental  
23 health remains inconclusive, and scholars have  
24 called for studies utilizing objective measures and  
25 rigorous methodologies.

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1 Do you see that?

2 A. I see that.

3 Q. And then it cites the Odgers and Jensen  
4 paper that we talked about earlier, correct?

5 A. Correct.

6 Q. Is that statement still true today:  
7 The research examining associations between social  
8 media use and mental health remains inconclusive,  
9 and scholars have called for studies utilizing  
10 objective measures and rigorous methodologies?

11 MS. COUCH: Objection. Vague.

12 THE WITNESS: In the context of this  
13 study, it's citing to the Odgers and Jensen. That  
14 statement is correct in that context.

15 But the broader literature that we have  
16 talked about today, that is not necessarily  
17 included and this statement does not necessarily  
18 support all of that.

19 BY MS. JONES:

20 Q. Do you think that the statement here in  
21 this -- well, is this a peer-reviewed paper?

22 A. This is.

23 Q. Okay. So this would have both been put  
24 together by yourself and four other academic  
25 researchers, Ph.D.s, correct?

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1 A. Not all of Ph.D.s, but correct.

2 Q. I apologize. Four other folks who were

3 involved in academic research; is that right?

4 A. Correct.

5 Q. Okay. Including Dr. Burnell, who is

6 someone with whom you collaborate in different ways

7 in your current role, right?

8 A. Correct.

9 Q. All right. And -- so that meant that

10 the paper, you all drafted it. And then it had to

11 be submitted to a set of reviewers, who would look

12 at it and say, "Do we think it's right? Do we

13 think it's wrong? Do we think they're fairly

14 interpreting their data?" et cetera. Right?

15 A. This went out for peer review.

16 Q. Yes. And just so we're clear, "peer

17 review" means other people beyond the five of you

18 reviewed the entire manuscript to determine whether

19 it was scientifically sound for purposes of

20 publication, right?

21 A. Broadly speaking, that is how peer

22 review works, yes.

23 Q. All right. And so the five of you

24 collectively wrote: Research examining -- wrote

25 last year: Research examining associations between

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1 social media use and mental health remains

2 inconclusive, and scholars have called for studies

3 utilizing objective measures and rigorous

4 methodologies.

5 And that statement also was subjected

6 to the review of other folks who are responsible

7 for evaluating papers that might be included in

8 this "Journal of Children and Media," correct?

9 MS. COUCH: Objection. Vague.

10 THE WITNESS: I mean, the -- the

11 sentence here within this context is referring to

12 the Odgers and Jensen article that indicates that

13 the associations between social media use and

14 mental health remains inconclusive.

15 BY MS. JONES:

16 Q. In -- in the context of putting this

17 manuscript together for eventual publication, did

18 you or your co-authors ever say, "Actually, we

19 don't think that the research examining

20 associations between social media use and mental

21 health are inconclusive"?

22 MS. COUCH: Objection. Vague.

23 THE WITNESS: I think that this is a

24 broad statement. And when we get into the more

25 specifics, we are making more causal claims.

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1 BY MS. JONES:

2 Q. Down -- let's talk about some of the

3 specifics. If you go down into the next section,

4 Social Media Use and Subjective Well-Being --

5 A. Uh-huh.

6 Q. -- there is a discussion of the fact

7 that adolescents are heavy users of social media,

8 correct?

9 A. Yes.

10 Q. That's what you say there, right?

11 A. Yes.

12 Q. And a little further down, there is a

13 discussion about the fact that prior research

14 generally relied on self-report measurements, and

15 it cites Odgers and Jensen again.

16 Do you see that?

17 A. Give me one second.

18 Q. Sure.

19 A. I see the sentence that says: However,

20 past research generally relies on self-report

21 measures. Is that what you're asking me?

22 Q. Yes.

23 A. Yep.

24 Q. Is that a reference to self-report

25 measurements of social media use? Is that what you

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1 understand that to mean?

2 A. I think it -- this is generally

3 indicating self-report measures about social media

4 use, I believe. So...

5 Q. Okay. So the whole sentence says:

6 Past research generally relies on self-report

7 measurements which are inaccurate of actual social

8 media use and potentially confounded by

9 dispositional subjective well-being.

10 Do you see that?

11 A. Yeah, I believe that that is

12 referring -- again, most of the research that we're

13 talking about here and what Odgers referred to in

14 the statement above that you originally had me look

15 at was the association between time spent on social

16 media and mental health.

17 Which was inconclusive and relatively

18 is inconclusive because we now have a much deeper

19 understanding of, when we look at specifics of

20 social media use, how it is impacting mental

21 health.

22 Q. And when you say "specifics of social

23 media use," based on our conversation earlier, what

24 you're talking about is things like habitual

25 checking?

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MS. COUCH: Objection. Misstates her testimony.

BY MS. JONES:

Q. Well, let me take a step back. What do you mean by the "specifics of social media use"?

A. Well, what I mean here is prior research -- referring back to the statement you had me look at before, that is research. And in the Odgers and Jensen paper, they're largely looking at this retrospective reporting of time spent on social media use. And there are potentially sort of inconclusive findings from that body of research.

But when we look at much more detailed and nuanced understandings of social media use, we get a much better understanding of it if we look at these within-person effects rather than a retrospective report, momentary links. We see much stronger effects.

When we look at some objective measures that complement some of self-report measures and helps us to understand their social media use, there's many ways in which social media use now is studied in ways that weren't in some of that earlier literature that did look at this more

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retrospective self-reported time spent on use.

And so when we use these within-person designs, like we're doing in this study, and longitudinal methods, we get a much clearer understanding of how social media is linked to mental health.

Q. I want just to follow up a little bit because I'm not -- I want to focus on my very specific question, which was -- and you just referred to detailed and nuanced ways of looking at social media use, and I want to make sure I understand. What are you talking about when you say that specifically?

A. I guess what I'm trying to do is contrast the prior work that we were referring to that measured a retrospective report of their overall time spent on social media use to get at more nuanced things.

For example, at a within-person level, you can ask them in the moments that it's happening are they using social media. And by repeatedly asking that over days, we get a much more nuanced understanding of their time spent on social media.

We can also look at the ways in which social media is potentially problematic. So

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looking at problematic social media use, there's lots of different ways now that we are looking at that nuanced perspective of social media use beyond what I was referring to there in that statement you had me read about the inconclusive data that was relying largely on these retrospective measures of overall time use.

Q. Okay. And then at the bottom of that same page, carrying over to Page 196, it says: Collectively, the question of how daily social media use relates to daily subjective well-being remains poorly understood and continues to be relevant given ongoing legislative efforts that aim for strict social media use among adolescents.

Did I read that correctly?

A. Sure. Yes.

Q. I did. Okay. And is that a true statement?

MS. COUCH: Objection. Vague.

THE WITNESS: That's the statement that's there, yes. I would say --

BY MS. JONES:

Q. I'm sorry. Let me ask my next question. Unless you're still answering my question, then let me ask my next question.

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A. I was going to add to that question -- to that answer.

Q. Go for it.

A. So this statement was based on the collective work that -- that, collectively, we'd been reviewing. But this paper, as well as many others that have come out, mean that we now have -- it's not -- no longer poorly understood. We know these links.

Q. So you think this paper clarified something that had previously been poorly understood?

A. We're stating that, based on the current understanding, there are some things that are poorly understood and so we need to do this research.

And other research that has come out means that this is no longer necessarily a poorly understood construct of how social media is relating to adolescents' daily well-being.

Q. Okay. I just -- but I just wanted to be clear.

What you wrote in this paper that was published, I assume, earlier this year in 2025 was: Collectively, the question of how daily social

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1 media use relates to daily subjective well-being  
2 remains poorly understood and continues to be  
3 relevant. Yes?

4 A. That is what it says.

5 MS. COUCH: Objection. Incomplete.

6 BY MS. JONES:

7 Q. Let me ask you to look at the second --  
8 actually, the third page of Exhibit Number 21.

9 Is that Exhibit 21? I forgot the  
10 numbers. Is that 21?

11 A. This is 21.

12 Q. Okay. Let me ask you to look at the  
13 third page of Exhibit Number 21, which is your  
14 paper published earlier this year.

15 A. Sorry. We're looking at the same  
16 document we've --

17 Q. Yeah. Yes.

18 A. -- been looking at? Okay.

19 Q. I apologize. No, no. I -- I created  
20 confusion.

21 A. "Page 3" meaning "Page 196" of the  
22 paper?

23 Q. Yes.

24 A. Okay.

25 Q. And towards the bottom of the page,

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1 there's a paragraph that begins with: The first  
2 aim of this study.

3 Do you see that?

4 A. I do.

5 Q. And it says: The first aim of this  
6 study was to examine daily links between social  
7 media use and subjective well-being.

8 Did I read that right?

9 A. Correct.

10 Q. And then it describes two different  
11 assessments that you did as part of the study,  
12 correct?

13 A. Correct. Correct. Sorry.

14 Q. And then a little further down in that  
15 same paragraph, there's a sentence that begins with  
16 the word "further." Do you see that?

17 A. Further, subjective use?

18 Q. Yes.

19 A. Yep.

20 Q. It says: Further, subjective use may  
21 be affected by the public narrative of social media  
22 harm.

23 Do you see that?

24 A. I see that.

25 Q. Now, earlier, you told me that when you

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1 say "may be" in your writings, it means likely --  
2 "more likely than not" or "probably." Is that what  
3 "may be" means in this article?

4 A. What I was referring to is, when I am  
5 talking about a result where we are talking about  
6 two things linked to each other from data in that  
7 paper, that that particular "may be" is where we  
8 are saying "probably."

9 Q. So you use the phrase "may be" in your  
10 peer-reviewed work in different ways? Is that what  
11 you're testifying to?

12 MS. COUCH: Objection. Vague.

13 THE WITNESS: I don't think I  
14 understand the question.

15 BY MS. JONES:

16 Q. Well, my -- you -- you told me earlier  
17 when we looked at another paper where you -- where  
18 you had used the phrase "may be," that what you  
19 actually meant was "probably" or "more likely than  
20 not." Do you remember telling me that?

21 A. I'm telling you --

22 MS. COUCH: Objection. Vague.

23 THE WITNESS: Sorry.

24 I'm telling you, in the context of that  
25 sentence that you showed me, when we are linking

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1 data from our paper, the predictor and the outcome,  
2 and discussing that X may be associated with Y, in  
3 the context of discussing our data and a variable  
4 that we saw was associated with that variable, that  
5 we use the word or phrase "may be" to indicate that  
6 these are associated with each other.

7 BY MS. JONES:

8 Q. Yeah, and my --

9 MS. JONES: I'm going to move to strike  
10 as nonresponsive.

11 BY MS. JONES:

12 Q. My question was, simply: Earlier, when  
13 we were looking at a paper where you used the  
14 phrase "may be," you told me that when you write  
15 and you write "may be," in those instances that we  
16 showed you earlier, you said it meant "probably" or  
17 "more likely than not." Is that what you told me?

18 MS. COUCH: Asked and answered.  
19 Argumentative.

20 THE WITNESS: In the context of those  
21 sentences that you pulled where we are describing  
22 that X may be associated with Y with the data that  
23 we have, when I say that X may be associated with Y  
24 in those two sentences that you pulled, I meant  
25 "probably."

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BY MS. JONES:

Q. Okay. But here, in Exhibit Number 21 at the bottom of Page 196, you say: subjective use may be affected by the public narrative of social media harm.

Do you see that?

A. I see that.

Q. In that instance, does the -- do the words "may be" mean "probably, more likely than not"?

A. That is -- sorry.

Q. No. Go ahead.

A. That is a different way of using "may be." When I'm talking about data that includes analyses and specific in my paper where we have a result that I am discussing where we have a predictor and an outcome and I am saying the predictor may be associated with the outcome in that context, I'm saying "probably." "May" can be used in different ways, and that is not necessarily the same use of that word.

Q. So when you say "may be" here, you're not saying "probably, more likely than not"; is that what you're telling me?

A. I'm telling you that this is not a

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predictor and an outcome that can be compared to that.

Q. Well, isn't this -- aren't you saying that subjective use -- that public -- the public narrative of social media harm could affect subjective use reporting?

A. I'm not -- these two things are quite different, in my opinion.

Q. Okay. Well, let me just ask you this: If -- if I were to read two of your papers by Dr. Telzer where in one place you said the words "may be" and in another place you said the words "may be," how would I understand what you mean at any given time when you say "may be" in a sentence?

A. When I am talking about data that I have published where I have the known statistics in these analyses and you are asking me about that specific line, I can tell you that that means "probably."

Q. What if I'm -- what if I'm a person reading your articles without the benefit of sitting in front of you asking you, "What did you mean by these words?"

If I'm just a person in the world reading two different articles by Dr. Telzer where

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in one you've used the phrase "may be," and in the other, you've also used the phrase "may be," how would I know the different ways that you have testified you use the words "may be" in your writing?

MS. COUCH: Objection. Conjecture.

THE WITNESS: I can't speculate on how people would read my papers.

BY MS. JONES:

Q. Would there be any way for someone to know what you meant by the words "may be" without the benefit of getting to depose you and ask you questions under oath, "What did you mean here?"

MS. COUCH: Objection. Hypothetical.

THE WITNESS: I can't speculate on what people would be able to interpret --

BY MS. JONES:

Q. Okay. But --

A. -- from reading something.

Q. But just so we're clear, you're using the same -- those two same words in different ways in two different articles, right?

MS. COUCH: Objection. Vague.

THE WITNESS: I think that I indicated how I used it in the context of associations, with

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known data associated with it, with known statistics that we included and how we discuss results in a paper.

BY MS. JONES:

Q. And in this paper that we're looking at now on 196, if I were reading this paper, would it be accurate to say that subjective use, probably, more likely than not, has been affected by the public narrative of social media harm?

A. I don't think that that is accurate in this use. I also don't think it matters if subjective use could be affected by public narrative of social media harm.

Q. Well, wouldn't it matter if the fact that a young person sees a news report about what has been described as a mental health crisis among young people and social media addiction -- wouldn't it be the case that if that kind of public narrative could affect reports of subjective use of social media, that would be relevant?

MS. COUCH: Objection. Vague. And hypothetical.

THE WITNESS: I don't know. It's really hard to speculate on that hypothetical. I think that most people are -- have seen the public

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1 narrative of social media harms. It's widely out  
2 there. The Surgeon General reported it. The APA  
3 has reported it.

4 If every single human has been exposed  
5 to those narratives, then this hypothetical would  
6 also say that every single human is reporting harms  
7 from social media.

8 BY MS. JONES:

9 Q. Okay. Well, just -- let's just -- so  
10 let me just button this up here.

11 Earlier this year, a paper was reported  
12 on which you were a co-author, where you all wrote:  
13 Subjective use may be affected by the public  
14 narrative of social media harm. Yes?

15 A. We wrote that, yes.

16 Q. Adolescents are well aware of and may  
17 internalize this narrative.

18 You also wrote that, right?

19 A. Yes.

20 Q. And it goes on to say: which in turn  
21 may influence how they estimate their own time  
22 spent using social media and how aspects of their  
23 well-being inform this estimation. Correct?

24 A. That's what's written there.

25 Q. Let me ask you to turn to Page 204 in

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1 that same paper, Exhibit Number 21, your paper  
2 published earlier this year. At the bottom of  
3 Page 204 is where the discussion section starts,  
4 right?

5 A. Yes.

6 Q. And it says here: There is much  
7 concern that social media use is negatively  
8 affecting youth, with concerns compounded by fear  
9 that young people are falling prey to addictive  
10 social media features. Correct?

11 A. That's what we say, yes.

12 Q. And then you go on to report: The  
13 current research found that daily objective, but  
14 not subjective, social media use was related to  
15 greater negative -- excuse me -- greater depressive  
16 negative affect. Is that right?

17 A. That's correct.

18 Q. And what that's referring to  
19 specifically is the difference between someone just  
20 telling you what their recall was or their  
21 awareness was of their social media use versus  
22 having a mechanism for collecting that information  
23 objectively; is that right?

24 A. Yeah, this is based on the objective  
25 measures from their phones that tell us how long

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1 they were on social media versus their self-report  
2 measures of that.

3 Q. Right.

4 And the finding that's reported here is  
5 that the daily objective use -- social media use  
6 was related to greater depressive negative affect?  
7 Do you see that?

8 A. Yes.

9 Q. Now, that is not a finding by you and  
10 your co-authors that the research found that there  
11 was a relationship to an actual diagnosis of  
12 depression, correct?

13 A. We are looking within a person. So  
14 regardless of their diagnosis, an adolescent who  
15 has low depression on average and an adolescent who  
16 has high depression on average show the similar  
17 affect; that in the moments that they -- or in the  
18 days where they're using social media more, their  
19 negative depressed affect is increasing.

20 Q. And that -- that's based on what they  
21 reported on how they were feeling, right?

22 A. That's based on the daily reports of  
23 their depressive negative affect.

24 Q. And if you go to the next page,  
25 Page 205 of Exhibit 21, your paper from earlier

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1 this year, there's a section entitled "Daily  
2 Associations Between Social Media Use and  
3 Subjective Well-Being." Do you see that?

4 A. Yes.

5 Q. And it says: In examining associations  
6 with subjective well-being, past research suggests  
7 that negative associations would emerge for  
8 self-reported social media use and null  
9 associations would emerge for objectively recorded  
10 social media use.

11 Do you see that?

12 A. I see that.

13 Q. What you and your co-authors say is  
14 actually counter to those studies: Daily reported  
15 social media use was not associated with subjective  
16 well-being at the within- or between-person level,  
17 and objectively recorded social media use was  
18 associated with greater depressive negative affect  
19 at the within-person level.

20 Did I read that correctly?

21 A. Correct.

22 Q. Then it goes on to say: The null  
23 associations with self-reported use could be due to  
24 methodology differences. Correct?

25 A. Correct.

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Q. And it says: Past research is mainly cross-sectional, and the few studies examining associations at the daily or momentary level find great heterogeneity in how self-reported social media use may relate to psychosocial adjustment outcomes.

Do you see that?

A. Yes.

Q. And that's an accurate statement, correct?

A. I mean, that's what we wrote here.

Q. Yes.

A. Yes.

Q. And you wouldn't have written it if you thought it was inaccurate, right?

A. That's what we wrote here.

Q. Okay. And on days in which adolescents engage in greater objective social media use relative to their own average, they reported greater depressive negative affect throughout that day.

Do you see that?

A. I do.

Q. That's the finding that we were just talking about a moment ago, right?

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A. Correct.

Q. Okay. You all go on to say: This association is not indicative of a cause-and-effect relation. Right?

A. Yes.

Q. And is that a true statement?

A. That is a sort of caveat and a careful statement that we include in this type of publication.

Q. Is it true is my question.

MS. COUCH: Objection. Vague.

THE WITNESS: I think I --

BY MS. JONES:

Q. Well, hold on a second given the objection. Do you understand what I'm asking you when I ask is something true?

A. I don't think I do, actually.

Q. Let me try -- what do you understand the word "true" to mean?

A. I mean, I understand truth. I don't know -- I guess I don't know -- that is the statement that is here. That is accurate.

Q. Okay. That -- maybe that's a different way of asking you the question.

A. Yes.

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Q. This statement here that you and your co-authors published earlier this year, this association is not indicative of a cause-and-effect relation. Is that accurate?

A. That's accurate.

Q. It goes on to say --

And so just looking back at our day together, when I have asked you is something true --

A. Yeah.

Q. -- if I had asked you is that accurate, would that have been easier for you to answer those questions?

A. I think so.

Q. Okay. Well, I'll know for next time.

All right. Moving on.

As outlined above, it is possible that social media use displaces activities critical for adolescent health, including in-person interactions, sleep, and physical activity. Correct?

A. I see that, yes.

Q. Alternatively, it is plausible on days in which adolescents are already experiencing greater depressive symptoms, they are more likely

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to turn to social media, suggesting that social media may be used for mood management. Is that accurate?

A. I see that, yes.

Q. Well, my question was not did you see it. Is that an accurate statement?

A. That is accurate as written here.

Q. It goes on to say: Associations with anxious, negative affect and positive affect were not observed.

A. Uh-huh.

Q. Is that right?

A. Correct.

Q. And additional research is needed before drawing sweeping conclusions on how social media use may be disrupting adolescents' subjective well-being.

Is that an accurate statement?

A. That is accurately written.

Q. Now, earlier, I was asking you if, in your research, you had done assessments of whether -- and I might be confusing your research, so you can correct me -- of whether you all had evaluated anxiety or anxiety-related affect.

Do you recall my questions on that?

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1 A. Yeah. And I think I recall that I was  
2 pretty sure that I had.

3 Q. Okay.

4 A. The results that I was talking about  
5 were in regards to depressed affect.

6 Q. Okay. And I just want to make sure.  
7 Is -- is what we were talking about, what you were  
8 referring to earlier, is that the same data that's  
9 reported on here: Associations with anxious,  
10 negative affect and positive affect were not  
11 observed?

12 MS. COUCH: Objection. Vague.

13 THE WITNESS: I don't recall  
14 specifically what that was referring to.

15 BY MS. JONES:

16 Q. Okay. But it seems like you and your  
17 co-authors settled on: Additional research is  
18 needed before drawing sweeping conclusions on how  
19 social media use may -- may be disrupting  
20 adolescents' subjective well-being. Correct?

21 A. It's correct that we noted that. As in  
22 any research, we don't draw sweeping conclusions  
23 based on a singular study, but based on our  
24 conclusions, based on the -- or at least the  
25 broader, larger statements, based on the literature

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1 writ large.

2 Q. When you reported on your 2025 paper  
3 that we've just been discussing, Exhibit Number 21,  
4 in your written report for this litigation --

5 A. Uh-huh.

6 Q. -- did you note the fact that you and  
7 your co-authors had said that the association that  
8 you identified is not indicative of a  
9 cause-and-effect relationship?

10 A. I think I did not indicate that  
11 specific -- specific comment because I went on to  
12 describe all of the reasons why this research is  
13 very rigorous and allows us to make the most causal  
14 claims that we can with this intensive longitudinal  
15 design, where we have these within-person analyses  
16 across multiple time points.

17 I would like to refer to that section  
18 in order to discuss all of the benefits of this  
19 type of methodology and using that in combination  
20 with all of the other research to be able to come  
21 to the conclusion that we can say that these are --  
22 that these social media experiences are leading to  
23 changes in their depressed affect.

24 MS. JONES: Dr. Telzer, I'm going to  
25 move to strike everything after, "I think I did not

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1 indicate that specific comment." And I'm going to  
2 move on to my next question.

3 BY MS. JONES:

4 Q. Down at the bottom of the page -- down  
5 at the bottom of that same page, 205, there's a  
6 paragraph that begins with: The discrepancies  
7 observed.

8 A. Yes.

9 Q. And, actually, let me ask you to step  
10 up just a sentence into the preceding paragraph.

11 Do you see the sentence that begins  
12 with: Past research?

13 A. Yes.

14 Q. It says: Past research has established  
15 that these self-reports are systematically biased.

16 Do you see that?

17 A. I do.

18 Q. And that's referring to self-reports of  
19 social media use?

20 A. I think so.

21 Q. Is that an accurate statement?

22 A. In this sentence -- sorry. I'm looking  
23 at the broader context of that sentence.

24 Q. Okay.

25 A. I mean, I think that this is referring

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1 to some of the biases that are present in  
2 self-report measures.

3 Q. Okay. And then a little further down,  
4 it says -- well, to finish that sentence, it says:  
5 Therefore, these reports are likely capturing an  
6 element of social media use that goes beyond actual  
7 use.

8 Do you see that?

9 A. Yes.

10 Q. Okay. And then in the next paragraph,  
11 it says: The discrepancies observed between  
12 objective and subjective provide further evidence  
13 that the variables are measuring two different  
14 constructs.

15 Did I read that correctly?

16 A. Yes.

17 Q. It says -- and this comes back to  
18 something we were talking about earlier: Negative  
19 public messaging on the effects of teen social  
20 media use is strong.

21 Do you see that?

22 A. Yes.

23 Q. And that's an accurate statement,  
24 right?

25 A. Yes.

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1 Q. Negative public messaging on the  
2 effects of teen social media use is strong, and the  
3 notion of social media being addictive is  
4 internalized and voiced by youth.

5 Is that an accurate statement?

6 A. Yes. And as I've talked about, many of  
7 the teens that I've talked to in our own research,  
8 the majority of them are telling us that they are  
9 addicted to social media.

10 Q. Sure. I remember you saying that, and  
11 I want to follow up on that.

12 A. Uh-huh.

13 Q. Because I want to direct you to what  
14 you and your co-authors said just earlier this year  
15 in this published paper.

16 This may lead -- I'm still reading in  
17 the same paragraph --

18 A. Uh-huh.

19 Q. -- carrying over to Page 206.

20 This may lead them to overestimate  
21 their use. Indeed, adolescents tend to perceive  
22 more time spent on social media than is objectively  
23 recorded.

24 Is that an accurate statement?

25 A. There are some papers that do show that

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1 their estimates are -- that their self-report  
2 estimates are higher than objectively recorded.

3 THE WITNESS: And if you don't mind,  
4 since that question has ended, I could use a break.

5 MS. JONES: I'm very -- I was going to  
6 propose concluding in the next probably five to  
7 seven minutes. If you want to take a break before  
8 that, I don't have any objection to it. It's  
9 entirely up to you.

10 THE WITNESS: A quick break, and  
11 then --

12 MS. JONES: Yes.

13 THE WITNESS: -- we can do the five to  
14 ten minutes.

15 MS. JONES: You can -- you can take a  
16 break.

17 THE VIDEOGRAPHER: Going off the  
18 record. The time is 6:14 p.m.

19 \* \* \*

20 (Whereupon, there was a recess in the  
21 proceedings from 6:14 p.m. to 6:21 p.m.)

22 \* \* \*

23 THE VIDEOGRAPHER: Going back on the  
24 record. The time is 6:21 p.m.

25 MS. COUCH: And we are going to

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1 conclude for the day at the witness's request, and  
2 we will start back tomorrow at 9 a.m.

3 THE VIDEOGRAPHER: So, for today, the  
4 total time on the record for Meta was 7 hours and 7  
5 minutes.

6 MS. JONES: Okay. Thank you.

7 THE VIDEOGRAPHER: That ends this  
8 deposition. The time is 6:21 p.m.

9 (WHEREUPON, the deposition was  
10 concluded at 6:21 p.m.)

11 (The witness reserves the right to read  
12 and sign this transcript.)

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## DEPOSITION ERRATA SHEET

3 Our Assignment No: 7396476

4 Case Caption: Social Media Adolescent Addiction  
5 (JCCP No. 5255)

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7 I declare under penalty of perjury that I  
8 have read the entire transcript of my Deposition  
9 taken in the captioned matter or the same has been  
10 read to me, and the same is true and accurate, save  
11 and except for changes and/or corrections, if any,  
12 as indicated by me on the DEPOSITION ERRATA SHEET  
13 hereof, with the understanding that I offer these  
14 changes as if still under oath.

15 Sign on the \_\_\_\_\_ day of  
16 \_\_\_\_\_, 20 \_\_\_\_.

21 \_\_\_\_\_  
22 EVA H. TELZER, Ph.D.

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## CERTIFICATE OF REPORTER

I, Cindy A. Hayden, Registered Merit Reporter and Notary Public for the State of North Carolina at Large, do hereby certify that the foregoing transcript is a true, accurate, and complete record.

I further certify that I am neither related to nor counsel for any party to the cause pending or interested in the events thereof.

Witness my hand, I have hereunto affixed my official seal this 13th day of June, 2025 at Charlotte, Cabarrus County, North Carolina.



Cindy A. Hayden, RMR, CRR  
My Commission expires  
April 7, 2027

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SUPERIOR COURT OF THE STATE OF CALIFORNIA  
FOR THE COUNTY OF LOS ANGELES

COORDINATION PROCEEDING ) JCCP No. 5255  
SPECIAL TITLE [Rule 3.400] ) For Filing Purposes:  
 ) 22STCV21355  
 )  
IN RE: SOCIAL MEDIA ADOLESCENT )  
ADDICTION (JCCP No. 5255) )

THIS DOCUMENT RELATES TO:  
Cristina Arlington Smith, et al.  
V. Meta Platforms, Inc., et al.,  
Case No. 22STCV21355

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VIDEOTAPED DEPOSITION OF EVA H. TELZER, Ph.D.

JB Duke Hotel

230 Science Drive

Durham, North Carolina

Friday, June 13, 2025, 9:02 a.m.



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1	P R O C E E D I N G S		
2	* * *		
3	THE VIDEOGRAPHER: We are now on		
4	record. Today's date is June 13th, 2025. The time		
5	is 9:02 a.m. This is the continuation of Eva		
6	Telzer. We can proceed.		
7	* * *		
8	EVA H. TELZER, Ph.D.,		
9	having been previously duly sworn, was examined and		
10	testified as follows:		
11	* * *		
12	EXAMINATION		
13	BY MS. JONES:		
14	Q. Okay. Dr. Telzer, good morning.		
15	A. Good morning.		
16	Q. Did you do anything to prepare for your		
17	second day of testimony today?		
18	A. By "prepare," I went back to my room,		
19	and I looked at my report again and rereviewed some		
20	of the documents in my materials considered, went		
21	to bed.		
22	Q. Okay. Looked back at your report. You		
23	said you reviewed some of the things on your list		
24	of materials considered?		
25	A. Correct.		

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1	Q.	And went to bed; is that right?	
2	A.	Yeah.	
3	Q.	Okay. Of the things on your materials	
4		considered list that you rereviewed, what did you	
5		review? Last night. Excuse me.	
6	A.	I reviewed a handful of documents,	
7		rereviewing some of the internal defense documents,	
8		looking at some of the publications. Nothing --	
9		everything in my materials considered list was	
10		things that I looked over.	
11	Q.	What's -- what internal documents did	
12		you go back and look at again?	
13	A.	I opened up lots of them and rereviewed	
14		them.	
15	Q.	How many is "lots"?	
16	A.	Dozens, if not more.	
17	Q.	So last night, you reviewed dozens of	
18		internal documents; is that your testimony?	
19	A.	I relooked at -- yes, I relooked at	
20		documents.	
21	Q.	From which defendants?	
22	A.	I can't recall all of the ones that I	
23		looked at. I opened probably some from all the	
24		defendants.	
25	Q.	And of the additional -- was there a	

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1 reason that you went back and looked at the  
2 internal documents that you had cited on your  
3 materials considered list?

4 A. I wanted to remind myself of some of  
5 the things that I was considering, given the  
6 quantity of things that I considered in there.

7 Q. And what additional literature did you  
8 go back and review last night?

9 A. I don't recall off the top of my head.

10 Q. How many pieces of literature did you  
11 review last night?

12 A. I don't recall.

13 Q. You don't know one way or the other  
14 what you were looking at last night?

15 A. No.

16 MS. COUCH: Objection. Asked and  
17 answered.

18 THE WITNESS: I don't recall. I was  
19 pretty brain-dead last night. I don't remember.

20 BY MS. JONES:

21 Q. What was -- was it your literature you  
22 were rereviewing, or was it publications by others?

23 MS. COUCH: Asked and answered.

24 THE WITNESS: I don't recall.

25 BY MS. JONES:

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1 Q. How many hours last night did you spend  
2 rereviewing your report, rereviewing dozens of  
3 internal company documents and rereviewing some  
4 unknown number of published papers?

5 A. An hour or so.

6 Q. Did you meet with your -- don't tell me  
7 what you talked about. Did you meet with your  
8 lawyers last night?

9 A. We had dinner together.

10 Q. Okay. Don't tell me what you talked  
11 about specifically, but did you talk about your  
12 testimony?

13 A. Chitchatted. My brain was dead. It  
14 was a friendly conversation.

15 Q. All right. Did you review any of the  
16 videos that you were shown yesterday?

17 A. I don't believe so.

18 Q. Okay. So you didn't go back and review  
19 the entirety of, for example, the seminar you  
20 participated in earlier this year in February 2025?

21 A. I went back and pulled up the slides.

22 Q. Did you go back and actually review the  
23 video itself?

24 A. I did not rewatch the video in its  
25 entirety.

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1 Q. What about for any of the other videos  
2 that you were shown yesterday? Did you go back and  
3 rewatch the entirety of any of them?

4 A. No.

5 Q. Anything else you did last night -- in  
6 terms -- I should --

7 A. Yeah.

8 Q. -- say this differently. I'm sure you  
9 did many other things.

10 Is there anything else you did last  
11 night in connection with preparation for your  
12 testimony today?

13 A. No. No.

14 Q. Okay. Let me ask you to pull back out  
15 what I think is marked as Deposition Exhibit Number  
16 21, which we were talking about yesterday before we  
17 concluded.

18 And Deposition Exhibit Number 21 is the  
19 paper that you, Dr. Burnell and others co-authored,  
20 published earlier this year in the "Journal of  
21 Children and Media," correct?

22 A. Yes.

23 Q. And I wanted to follow -- I wanted to  
24 finish what we were talking about before we  
25 concluded yesterday. Let me ask you to go to

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1 Page 207 of Exhibit 21.

2 A. Okay.

3 Q. And there's a section entitled  
4 "Links of Daily Subjective Well-Being."

5 Do you see that?

6 A. Yes.

7 Q. And then in the second paragraph, it  
8 recounts some of the findings from your study; is  
9 that right?

10 A. The paragraph ASMU was associated with?

11 Q. Yes.

12 A. Yes, it's discussing those associations  
13 that we found.

14 Q. Okay. And it says: Includes, for  
15 example, the finding that ASMU --

16 And just so we're kind of reset on our  
17 terms, "ASMU" is what?

18 A. Addiction-like social media use.

19 Q. Okay. ASMU was associated with daily  
20 anxious-negative affect in the EMA, with this  
21 association disappearing when controlling for other  
22 factors such as depressive symptoms.

23 Did I read that correctly?

24 A. You did.

25 Q. And that -- is that an accurate finding

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1 from your study?

2 A. That is what is stated there, yes.

3 Q. Okay. And when it says "with this  
4 association disappearing when controlling for other  
5 factors such as depressive symptoms," that means  
6 that once you actually went through the analysis of  
7 controlling for depressive symptoms, any  
8 association that was shown between daily  
9 anxious-negative affect and ASMU disappeared. Am I  
10 reading that correctly?

11 A. That's what that's saying.

12 Q. Okay. And that was one of the findings  
13 from this study published earlier this year; is  
14 that right?

15 A. That is one of the findings.

16 Q. Okay. If you jump down to the next  
17 paragraph on Page 207, it says: These findings  
18 should be considered in the context of the broader  
19 theoretical contribution of addictive social media  
20 measures.

21 Do you see that?

22 A. I do.

23 Q. And when it refers there to "these  
24 findings," that's a reference to the findings  
25 reflected in your paper published earlier this

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1 year; is that right?

2 MS. COUCH: Objection. Vague.

3 BY MS. JONES:

4 Q. Let me -- let me ask a more specific  
5 question. That's fair.

6 The findings that are described in this  
7 section entitled "Links with Daily Subjective  
8 Well-Being," are those the findings that are  
9 referred to at this paragraph at the bottom of 207?

10 A. I'd have to look in more detail of  
11 whether it is specifically referring to that single  
12 paragraph.

13 Q. Okay. Generally, though, this is  
14 referring to some findings that are reflected in  
15 your paper from 2025?

16 A. I believe that's likely what that is  
17 saying.

18 Q. Okay. And it goes on to say -- and  
19 this reference to addictive social media measures,  
20 that's a reference to measures that have been  
21 developed or discussed in the literature around  
22 assessing whether or not what has been described in  
23 some places as social media addiction might exist  
24 in an individual; is that right?

25 A. I'm not sure I can extrapolate to that

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1 level. I think we are talking about broader  
2 contributions of other measures.

3 Q. Well, what it says here is: Numerous  
4 measures exist that assess problematic, dependent,  
5 or addictive social media use.

6 Do you see that?

7 A. Yes.

8 Q. And it goes on to say: Most existing  
9 measures apply a substance use disorder measurement  
10 strategy to assess social media addiction. Is that  
11 right?

12 A. Uh-huh.

13 Q. You have to say "yes" or "no."

14 A. Yes. Sorry.

15 Q. And put the word "addiction" in  
16 quotation marks, yes?

17 A. Yes.

18 Q. When this refers to using a substance  
19 use disorder measurement strategy to assess social  
20 media addiction, is -- is that the approach that  
21 was taken in your 2024 Flannery paper?

22 A. Can you repeat that question, please?

23 Q. Sure.

24 When it refers here to using --  
25 applying a substance use disorder measurement

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1 strategy to assess social media addiction, is that  
2 the approach that you and your co-authors applied  
3 in your 2024 Flannery paper?

4 MS. COUCH: Objection. Vague.

5 THE WITNESS: I'm not sure I can  
6 extrapolate to that.

7 BY MS. JONES:

8 Q. Well, am I recalling correctly from  
9 your Flannery paper that you and your -- that you  
10 and your -- that in your -- in the Flannery paper  
11 from 2024, which was Exhibit 20 from yesterday,  
12 that you and your colleagues started with the DSM-5  
13 substance use disorder checklist; is that right?

14 A. We did.

15 Q. And then you used that to generate what  
16 is described in your Flannery 2024 paper as a  
17 "novel seven-item questionnaire," right? You're  
18 welcome to look at Exhibit 20.

19 A. Sure. We described it as that. We  
20 used those measures. We used those items from the  
21 substance use measure to develop that.

22 Q. I'm on Page 3 of Exhibit 20. That's  
23 what I'm reading from, if you want to...

24 A. Yeah.

25 Q. So just -- just to get ourselves

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1 situated, in Exhibit 21, you and your co-authors  
2 refer to applying a substance use disorder  
3 measurement strategy to assess social media  
4 addiction, correct?

5 That's what you describe in -- on  
6 Page 207, right?

7 A. Yes.

8 Q. And -- and that's -- is that what you  
9 and your co-authors did in your 2024 paper that you  
10 published with Jessica Flannery and others?

11 A. That is what that measures, as well as  
12 other measures have done, yes.

13 Q. And you're referring to "other  
14 measures." I'm just -- I want to just be very  
15 focused with my question.

16 What -- what is described here,  
17 applying a substance use disorder measurement  
18 strategy to assess social media addiction, that's  
19 the approach that you and your co-authors used in  
20 your 2024 Flannery paper, correct?

21 A. Correct.

22 Q. And what you and your co-authors said  
23 earlier this year about that approach is: This  
24 measurement is not without criticism, particularly  
25 because of its confirmatory approach in which the

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1 existing substance use assessment is assumed to  
2 apply to behavioral addictions and disagreement  
3 among scholars on the applicability of certain  
4 criteria to technology-based addictions.

5 Do you see that?

6 A. I see that.

7 Q. And I read that correctly, yes?

8 A. You did.

9 Q. And if I'm understanding correctly,  
10 what that is saying is that the approach that you  
11 and your colleagues took in your 2024 Flannery  
12 paper has been criticized in part because it  
13 assumes that the substance use disorder model is  
14 the right approach to take in evaluating what has  
15 been described as social media addiction; is that  
16 right?

17 MS. COUCH: Objection. Vague.

18 THE WITNESS: I think right here we're  
19 just referencing some limitations in the  
20 literature.

21 BY MS. JONES:

22 Q. And -- and not just limitations.  
23 You're referencing criticisms that have been  
24 applied to the approach that you and your  
25 colleagues took in your 2024 Flannery paper,

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1 correct?

2 MS. COUCH: Objection. Vague.

3 THE WITNESS: We're, here, highlighting  
4 some of the limitations of the ways of this  
5 measurement.

6 BY MS. JONES:

7 Q. And you specifically refer to  
8 "criticism," right?

9 MS. COUCH: Objection. Vague.

10 THE WITNESS: I think that this is a  
11 limitation --

12 BY MS. JONES:

13 Q. Well --

14 A. -- that we were referring to.

15 Q. Sure. But when the paper was published  
16 in 2025, what you all said was: This measurement  
17 is not without criticism.

18 Did I read that correctly?

19 A. That -- that sentence is correct.

20 Q. That's an accurate statement. Okay.

21 And it goes on to say: And there is  
22 disagreement among scholars on the applicability of  
23 certain criteria to technology-based addictions.

24 That's also an accurate statement,  
25 right?

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1 A. That is what that sentence says.

2 Q. It goes on to say: In this study, we  
3 similarly applied this measurement strategy,  
4 although we omitted problematic criteria that  
5 cannot cleanly be applied to social media use. And  
6 then it refers to tolerance and withdrawal.

7 Did I read that correctly?

8 A. You read that correctly.

9 Q. And what you and your co-authors are  
10 saying there in this paper published earlier this  
11 year is: We applied this measurement strategy, but  
12 we -- by that, I mean the strategy of taking the  
13 DSM-5 substance use disorder model and removing  
14 certain criteria in connection with this study; is  
15 that right?

16 A. What do you mean by "removing"? I'm  
17 sorry. I'm not -- the two pieces of that question,  
18 I'm not following.

19 Q. It was -- it was not a great question.

20 My question was simply: This refers to  
21 the fact that you applied this measurement strategy  
22 that's described here in this paragraph in your  
23 paper on Page 207, down at the bottom?

24 A. We are discussing the limitations here,  
25 yes.

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Q. Okay. And the -- the strategy that's specifically described is taking the DSM-5 criteria for substance use disorders and pulling out or omitting problematic criteria that could not be cleanly applied to social media use, correct?

A. I'm not sure about that, if the omission part is part of that --

Q. Well --

A. -- broader limitation.

Q. Excuse me. I'm just reading the -- I didn't mean to step on the end of your answer.

I'm just reading from what I understand to be the words on the page.

Am I correct in understanding, in your paper from 2025, earlier this year, that you and your co-authors reported that you had omitted problematic criteria that cannot cleanly be applied to social media use? Right?

A. We omitted the -- the -- the sentence right there, yes. "Although we omitted these criteria." That's what that is saying, yes.

Q. And yet the criteria that you're omitting from -- you're pulling the criteria from the DSM-5 in the first instance; is that right?

A. We are pulling out certain items that

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don't cleanly map on is what we're saying here.

Q. Sure. And I'm just -- I just want to make sure. Your starting point was to look at the DSM-5's listing of criteria for substance use disorders, correct?

MS. COUCH: Asked and answered.

THE WITNESS: We pulled out the items from the DSM-5 substance use measure.

BY MS. JONES:

Q. Yeah. Okay. And, for example, you didn't apply the tolerance or withdrawal criteria, yes?

A. We omitted those.

Q. Okay. And you and your co-authors, on Page 208 of Exhibit Number 21, say: Given that additional research is needed -- excuse me.

Given that additional research is needed before determining that problematic social media use can be appropriately given the "addiction" label akin to substance use disorders, we advise the conclusions of this study be considered with this in mind.

Did I read that correctly?

A. Yes.

Q. Do -- is it accurate, as reflected here

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in this paper that you are a co-author on published earlier this year, that: Additional research is needed before determining that problematic social media use can be appropriately given the "addiction" label akin to substance use disorders?

MS. COUCH: Objection. Vague.

THE WITNESS: This statement is here in this paper, yes.

BY MS. JONES:

Q. Yeah. That part, I know. My question is: Is that an accurate statement?

A. That's an accurate statement in this paper.

Q. Let me ask you to go to Page 1 of Exhibit Number 21, please. There's an abstract section of Exhibit Number 21, your 2025 paper. And I'm just kind of describing this in layperson's terms.

The abstract, generally speaking, provides a snapshot of the study's design, what it was aiming to evaluate, and, at a very high level, the results. Is that fair?

A. That's generally how abstracts are used is to describe the research questions.

Q. Okay.

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A. The methods and what we found.

Q. Sure. And in this abstract for your 2025 paper, the first sentence reads: Associations between adolescent social media use and well-being are inconclusive, and studies using rigorous methodologies and objective measures are needed.

Is that an accurate statement?

A. That statement is accurate in that.

Q. And it goes on to say in the same abstract -- and it -- it lays out different things that you and your co-authors looked to test.

Do you see that?

A. We tested these four different things, yeah.

Q. Yes. And it refers to the specific number of adolescents who were in your study, 103; is that right?

A. Yes.

Q. And then it goes on to say in general terms what your findings were, right?

A. It goes on to say -- if I can please read it to be able to answer that.

Q. Yes, of course. Sure.

A. Okay.

Q. You've had a chance to read that?

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1 A. I've had a chance to read it.  
 2 Q. Okay.  
 3 A. Thank you.  
 4 Q. No problem. Let me just ask my  
 5 question again.  
 6 A. Uh-huh.  
 7 Q. At the bottom of that abstract, in  
 8 general terms, describes the findings from your  
 9 2025 paper.  
 10 A. Yep.  
 11 Q. Is that right?  
 12 A. Yes, that is correct.  
 13 Q. And it specifically says -- excuse me:  
 14 In a sample of 103 adolescents, ASMU and perceived  
 15 addiction were highly correlated, but some  
 16 adolescents' classification differed when  
 17 cross-referencing.  
 18 Did I read that correctly?  
 19 A. Yes.  
 20 Q. And then it goes on to say: Both were  
 21 similarly associated with demographics and  
 22 depressive symptoms.  
 23 Did I read that correctly?  
 24 A. Yes.  
 25 Q. And then it goes on to say:

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1 Self-reported, but not objectively reported, social  
 2 media use was related to greater ASMU and perceived  
 3 addiction.  
 4 Did I read that correctly?  
 5 A. Yes.  
 6 Q. And is that an accurate account of one  
 7 of the findings from your study?  
 8 A. I would need to go back and reread this  
 9 to -- I mean, I would -- that's an accurate  
 10 sentence.  
 11 Q. Okay. And, again, just to be clear,  
 12 self-reporting of social media use, you mention in  
 13 your paper here, can be inaccurate of actual social  
 14 media use, correct?  
 15 MS. COUCH: Objection. Vague.  
 16 THE WITNESS: Self-report measures of  
 17 social media use are complementary to some of the  
 18 objective measures and tell us different things, as  
 19 I think is discussed in this article.  
 20 BY MS. JONES:  
 21 Q. Sure. But do you -- do you recall that  
 22 this article also says pretty directly that  
 23 self-report measurements are inaccurate of actual  
 24 social media use?  
 25 MS. COUCH: Objection.

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1 THE WITNESS: I need to look for that  
 2 statement.  
 3 BY MS. JONES:  
 4 Q. Let me show you -- I think we talked  
 5 about it yesterday. If you go to 190 -- the bottom  
 6 of 195.  
 7 A. Uh-huh.  
 8 Q. There's a reference to: However, past  
 9 research?  
 10 A. Yeah.  
 11 Q. This is referring to the Odgers and  
 12 Jensen paper that we talked about yesterday,  
 13 correct?  
 14 A. Correct.  
 15 Q. And it says: Past research generally  
 16 relies on self-report measurements which are  
 17 inaccurate of actual social media use and  
 18 potentially confounded by dispositional subjective  
 19 well-being.  
 20 Did I read that correctly?  
 21 A. That sentence is correct about past  
 22 research which has looked at large retrospective  
 23 self-reports --  
 24 Q. Okay.  
 25 A. -- of self-reported social media use.

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1 Q. And in the case of your study as  
 2 reflected here on Page 1, self-reported social  
 3 media use was related to greater ASMU and perceived  
 4 addiction; is that right?  
 5 A. Sorry. Are we back in the abstract?  
 6 Q. Yes, we are.  
 7 A. Can you say that again now that I'm  
 8 here?  
 9 Q. Sure.  
 10 Your -- on Page 1 of your -- in the  
 11 abstract of your paper --  
 12 A. Yeah.  
 13 Q. -- your colleagues and you earlier this  
 14 year published: Self-reported, but not objectively  
 15 reported, social media use was related to greater  
 16 ASMU and perceived addiction. Correct?  
 17 A. That's correct.  
 18 Q. And perceived addiction is what the  
 19 adolescents in your study reported about whether  
 20 they believed themselves to be addicted or not to  
 21 social media; is that right?  
 22 A. Yes, that's correct.  
 23 Q. That was not based on an actual  
 24 clinical diagnosis of social media addiction; is  
 25 that right?

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1 A. This was a measure and the methods  
2 where we asked adolescents specifically, "Do you  
3 think you may be addicted to social media?"

4 Q. Okay. Did you ask the adolescents,  
5 "Has any clinician diagnosed you with social media  
6 addiction?"

7 A. We did not.

8 Q. Okay. And so what we're talking about  
9 here when we talk about the relationship between  
10 self-reported social media use and greater ASMU and  
11 perceived addiction, we're talking about what the  
12 adolescents in your study perceived about the  
13 possibility that they were addicted to social  
14 media; is that right?

15 MS. COUCH: Objection. Vague.

16 THE WITNESS: It is based on their  
17 answer to the question -- specifically to the  
18 question, "Do you think you may be addicted to  
19 social media?"

20 BY MS. JONES:

21 Q. Okay. Is ASMU also based on  
22 self-reporting?

23 A. Yeah.

24 Q. Now, it looks like in that same  
25 sentence, that objectively reported social media

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1 use was not related to greater ASMU and perceived  
2 addiction; is that right?

3 A. I believe that's correct. I'm not  
4 seeing that sentence.

5 Q. I'm just reading the same sentence  
6 we've been talking about.

7 A. Yes. Yeah.

8 Q. Is that right?

9 A. That's correct.

10 Q. And objective -- objectively-recorded  
11 social media use would be your team being able to  
12 actually draw information about social media use  
13 from the adolescents' phone; is that right?

14 A. That's correct.

15 Q. Let me ask you to look at the box that  
16 appears right under the abstract, if you wouldn't  
17 mind, on the same page of your paper from this --  
18 published this year.

19 A. Uh-huh.

20 Q. It says: Impact summary.

21 A. Uh-huh.

22 Q. You have to say --

23 A. Yes.

24 Q. -- "yes" or "no."

25 And there's, first, a section entitled

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1 "Prior State of the Knowledge" --

2 A. Correct.

3 Q. -- yes?

4 A. Yes.

5 Q. And then there's a section entitled  
6 "Novel Contributions"; is that right?

7 A. Yes.

8 Q. And just to make sure I understand,  
9 that section of the paper gives you and your  
10 co-authors an opportunity both to kind of give a  
11 general sense of what the research to date has told  
12 us; is that right?

13 A. It looks like we are responding to, in  
14 one sentence, what the prior state of the knowledge  
15 is.

16 Q. Yes.

17 And then the other section in that  
18 impact summary is to give a sense of how your  
19 research advances the field in some way, generally  
20 speaking; is that right?

21 A. Generally speaking, to say the novel  
22 contribution of this study.

23 Q. Right. Right.

24 Here's what we're adding to what we  
25 already know, right?

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1 A. Sure.

2 Q. Okay. And what you say about the prior  
3 state of the knowledge in this paper published  
4 earlier this year is: Much existing evidence on  
5 the link between adolescent social media use and  
6 subjective well-being relies on retrospective  
7 self-reports of social media use, which may  
8 inaccurately assess -- excuse me -- assess use,  
9 fail to report within-day associations, and not  
10 consider individual differences.

11 Did I read that correctly?

12 A. You read that correctly.

13 MS. COUCH: Objection. Misstates the  
14 document.

15 BY MS. JONES:

16 Q. Did I -- did I read it incorrectly?

17 A. Can you reread it so I can respond?  
18 I'm sorry.

19 Q. Sure. That's --

20 MS. COUCH: There was one word -- there  
21 was one word off. Sorry.

22 MS. JONES: That's okay. I'll read it  
23 again.

24 BY MS. JONES:

25 Q. What you and your co-authors reported

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1 about the state of the knowledge as of the  
2 publication of your paper in 2025 was: Much  
3 existing evidence on the link between adolescent  
4 social media use and subjective well-being relies  
5 on retrospective self-reports of social media use,  
6 which may inaccurately assess use, fail to capture  
7 within-day associations, and not consider  
8 individual differences.

9 Did I read that correctly?

10 A. Yes, you read that correctly.

11 Q. And is that an accurate, again, very  
12 general statement of the state of the knowledge as  
13 you and your co-authors described it earlier this  
14 year in your publication?

15 A. That's a broad claim largely based on  
16 the Odgers paper, trying to underscore that these  
17 between-person retrospective reports may have  
18 limitations and that we need these within-day,  
19 within-person analyses to better capture the nuance  
20 of these processes.

21 And this study uses these within-person  
22 methods where we're getting dozens -- well, over a  
23 dozen data points on individual adolescents in  
24 order to really look at this as it's unfolding in  
25 their daily life, which has very strong benefits

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1 relative to some of the retrospective self-report  
2 measures that we're saying here prior research has  
3 looked upon.

4 Q. Okay. Can I ask you just a separate  
5 question? Do -- do you have a good regard for  
6 Candice Odgers as a researcher in this area?

7 MS. COUCH: Objection. Vague.

8 THE WITNESS: I have a high regard of  
9 Candice Odgers, yes.

10 BY MS. JONES:

11 Q. Okay. Do -- do you know her?

12 A. I do know her.

13 Q. Okay. In the novel contribution  
14 section of your paper from 2025, you say: Daily  
15 social media use (self or objective report) was not  
16 consistently associated with well-being.

17 Do you see that?

18 A. Daily social media use -- self -- yes.

19 Q. And is -- is that an accurate general  
20 description of one of the findings from your study?

21 A. That sentence is attempting to indicate  
22 that there were differences in the associations  
23 that we found. As we talked about, I think,  
24 yesterday, the daily social media use was related  
25 to depressed affect. It was not related to

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1 positive affect. And that's what we mean by  
2 "not consistently associated with well-being."

3 Q. Understood.

4 But what you reported here, just  
5 reading from the page, was -- was not consistently  
6 associated with well-being, right?

7 A. That's what that one sentence says.

8 MS. COUCH: Objection. Vague. Let me  
9 get my objection --

10 BY MS. JONES:

11 Q. And the next sentence says:  
12 Adolescents' reports of -- excuse me. Let me start  
13 again.

14 Adolescents' reports of addiction-like  
15 social media use were only linked to self-reported  
16 and not objectively-measured social media use, and  
17 did not moderate linkages with daily subjective  
18 well-being.

19 Did I read that correctly?

20 A. You read that correctly.

21 Q. And that is an accurate statement of  
22 one of the findings from your study published  
23 earlier this year, correct?

24 MS. COUCH: Objection. Vague.

25 THE WITNESS: That is generally

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1 describing the patterns of associations in this  
2 paper.

3 BY MS. JONES:

4 Q. Dr. Telzer, there were probably two or  
5 three occasions yesterday where you -- when we were  
6 talking about caveats and limitations that are  
7 articulated in some of your published work, that  
8 you said, "I'm a cautious researcher." Did I -- am  
9 I recalling that correctly?

10 A. I don't recall the specific way in  
11 which I said that yesterday, but I am a cautious  
12 researcher, yes.

13 Q. Okay. Well, that's -- I wanted -- let  
14 me -- I'm happy to level-set on that basic point.  
15 You consider yourself to be a cautious researcher,  
16 correct?

17 A. Correct.

18 Q. And part of that is that when you  
19 publish things in the peer-reviewed literature, you  
20 include things like a section on limitations so you  
21 can lay out caveats and limits that might be  
22 related to your study design and findings; is that  
23 right?

24 MS. COUCH: Objection. Vague.

25 THE WITNESS: Limitations sections are

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generally used to lay out potential limitations of a study.

BY MS. JONES:

Q. And part -- part of the reason that, if we read all of your peer-reviewed literature, that we likely would find you explaining caveats and limitations to your research is because you do that as part of trying to be a cautious researcher; is that right?

MS. COUCH: Objection. Vague.

THE WITNESS: We do that because that is what science does. We try to conduct very rigorous, strong science that gets peer-reviewed and published in these high-impact journals.

And we always include potential caveats and limitations to any singular study, at least with the examples we're looking at today.

BY MS. JONES:

Q. And you -- you used the phrase "what science does." One of the things that science does is, among other things, lay out what might be potential caveats or limitations with respect to a particular study. Is that true?

MS. COUCH: Objection. Vague.

THE WITNESS: In -- in empirical

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articles and as researchers in my field, we lay out potential limitations.

BY MS. JONES:

Q. Okay. And -- and that -- can you agree with me that that is, in fact, part of aiming to be or trying to be a cautious researcher is when you publish something, you lay out the caveats and the limitations of that particular study?

MS. COUCH: Objection. Vague.

THE WITNESS: I think that there are many components to being a cautious researcher.

BY MS. JONES:

Q. I would agree with you.

Is one of those components that you identify in a particular paper where you're reporting on a study you've done the caveats and the limitations of your study and its findings?

MS. COUCH: Asked and answered.

THE WITNESS: I think that there are many things that makes one a cautious researcher.

BY MS. JONES:

Q. Is one of them that you acknowledge caveats and limitations to your research?

A. One of the things that we do as scientists and in empirical articles is include

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caveats and limitations in these papers.

Q. What -- what are the other -- you've said, "I think that there are many things that makes one a cautious researcher." What are the other things you would put on that list of being a cautious researcher?

MS. COUCH: Objection. Vague.

THE WITNESS: I mean, there's a lot of speculation I can do. We --

BY MS. JONES:

Q. Well, let me be -- I don't want you to speculate.

I believe your testimony was, "I think there are many things that make one a cautious researcher." What are those things?

A. Well, there's many things that make us good researchers. We do well -- rigorous research. We conduct our research under IRB approval to ensure that we're protecting human subjects. We submit it to peer review to ensure that others are evaluating the quality of our work.

There's many things that go into this.

Q. Anything else you can think of?

A. There's many things.

Q. Okay. And -- and it sounds like you

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would also include on that list, if you're publishing a paper, including information about caveats and limitations of the research?

MS. COUCH: Asked and answered.

THE WITNESS: As I said, that is one of the standard things that we include as researchers in an empirical article.

BY MS. JONES:

Q. Okay. Is it true, when you publish an empirical article as what I think you've described as a "cautious researcher," that you don't want to overstate your findings?

MS. COUCH: Objection. Vague.

THE WITNESS: I think that, in any empirical singular study, we describe the results that we find and describe what they could mean, broadly speaking, what the implications of those findings could mean.

BY MS. JONES:

Q. Sure. And my -- my question was a little bit different.

My question was: When you are aiming to be a cautious researcher, is it true that you don't want to overstate your findings?

MS. COUCH: Asked and answered.

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1 THE WITNESS: I think in any empirical  
2 article we're aiming to, in this context or in this  
3 particular study, try to describe the findings  
4 thoroughly and what they could mean and what the  
5 broader implications are in that paper.

6 BY MS. JONES:

7 Q. Doctor, you, in some of the papers that  
8 we've looked at, including the paper that was  
9 published just earlier this year, the Flannery  
10 paper that we looked at yesterday and this morning,  
11 your Maza paper from 2023, your Armstrong-Carter  
12 paper -- you have laid out different caveats and  
13 limitations to the research, yes?

14 A. In each paper, we have included caveats  
15 and limitations in the discussion section.

16 Q. And you can -- you said you went back  
17 and looked at your report -- your written report  
18 for this litigation last night, correct? Or  
19 generally reviewed it last night?

20 A. Yes.

21 Q. Did -- did you review your report to  
22 see whether the caveats and limitations that are  
23 reflected in the papers of yours that you cited in  
24 your report, that -- that you included those  
25 caveats and limitations in your report?

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1 A. I did not look for that, no.

2 Q. Do you know whether you included in  
3 your written report that you generated for  
4 litigation the same caveats and limitations about  
5 those studies that you referenced that are  
6 reflected in the studies themselves?

7 A. I included in my report a discussion of  
8 lots of research studies, not necessarily going  
9 into the details of every limitation of that  
10 publication because it is not any individual  
11 limitation that might contribute to my overall  
12 opinion. It's the totality of all of the research  
13 that contributes to these opinions.

14 Q. And do you know one way or the other  
15 whether you included any of the caveats and  
16 limitations from your -- the papers themselves in  
17 your written report? Do you know?

18 MS. COUCH: Asked and answered.

19 THE WITNESS: Off the top of my head,  
20 I'm not sure if I included all of those  
21 limitations.

22 But the limitations, as I mentioned,  
23 are not necessarily inconclusive with any of my  
24 opinions. And a singular study or a singular  
25 limitation is not changing the overall totality of

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1 what the research findings are showing.

2 BY MS. JONES:

3 Q. Let me ask you to -- we're actually  
4 going to show you another video.

5 MS. JONES: And we're going to mark  
6 this as, I think Exhibit, Number 22. Is that  
7 right?

8 MS. ANTOINE: Uh-huh.

9 MS. COUCH: And just so the record is  
10 clear, what's actually being provided as an  
11 exhibit?

12 MS. ANTOINE: This is the slip sheet  
13 and then the clip will also be --

14 MS. COUCH: Just the clip, yes.

15 MS. JONES: It will be the clip.

16 MS. COUCH: Can you send that over,  
17 please.

18 (TELZER EXHIBIT 22, Video - Interview  
19 with Eva Telzer and Mitch Prinstein at the 2023  
20 BrainMind Summit, was marked for identification.)

21 MS. JONES: Can you hold on just a  
22 second before you play that one?

23 Okay. Why don't we go ahead and play  
24 Exhibit Number 22, please.

25 (Playing video.)

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1 BY MS. JONES:

2 Q. Dr. Telzer, that is you, correct, in  
3 that video?

4 A. Correct.

5 Q. And also Dr. Mitch Prinstein, correct?

6 A. Correct.

7 Q. And you've -- you've published with  
8 Dr. Prinstein?

9 A. Uh-huh.

10 Q. You have to say "yes" or "no."

11 A. Yes.

12 Q. I actually wanted to ask you about a  
13 very specific -- do you recall this? And if you  
14 don't, I understand.

15 I will represent to you -- and you can  
16 tell me if this resonates with your recall --  
17 participating in a -- what's known as a BrainMind  
18 Summit in October of 2023?

19 A. Yes.

20 Q. Do you specifically recall this talk  
21 that you did with Dr. Prinstein?

22 A. I remember we were interviewed.

23 Q. Okay. One of the things that you  
24 specifically said in the remarks just a moment ago  
25 in Exhibit Number 2 [sic] is, "So if they are" --

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1 "it really depends what adolescents are doing when  
2 they're on social media."

3 Did you hear that?

4 A. I believe so.

5 Q. And -- and is that an accurate  
6 statement: It really depends what adolescents are  
7 doing when they're on social media?

8 MS. COUCH: Objection. Vague.

9 THE WITNESS: That's what I said in  
10 that one-sentence clip.

11 BY MS. JONES:

12 Q. Yeah. And then the next sentence says,  
13 "So if they're online connecting with their close  
14 friends and having good, happy conversations, a few  
15 hours is probably not problematic."

16 Do you remember hearing yourself say  
17 that?

18 A. I recall saying -- seeing that in this  
19 moment, yes.

20 Q. And was -- was that an accurate -- I  
21 shouldn't -- was that an accurate statement?

22 MS. COUCH: Objection. Vague.

23 THE WITNESS: That statement was what I  
24 said there, yes.

25 BY MS. JONES:

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1 Q. And, again, I think you told me this  
2 generally as to what you aim to do when you're  
3 giving talks. But you -- you aim to be accurate in  
4 what you're communicating to whoever your audience  
5 happens to be, right?

6 MS. COUCH: Objection. Vague.

7 THE WITNESS: Broadly speaking, I try  
8 to be thorough. This one clip is a quick,  
9 out-of-context clip. I am seeing what you said  
10 right there.

11 BY MS. JONES:

12 Q. Okay. And I think you said -- you  
13 recall saying that.

14 And then the next thing you said was,  
15 "If they're online for a few minutes and are  
16 exposed to cyberhate or something negative, a few  
17 minutes is too much."

18 Do you remember saying that?

19 A. I saw that, yes.

20 Q. And was that an accurate statement?

21 MS. COUCH: Objection. Vague.

22 THE WITNESS: That's what I said in  
23 that sentence there.

24 BY MS. JONES:

25 Q. Is that -- is -- are those two

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1 statements -- "If they are online connecting with  
2 their close friends and having good, happy  
3 conversations, a few hours is probably not  
4 problematic. And if they're online for a few  
5 minutes and are exposed to cyberhate or something  
6 negative, a few minutes is too much," are those two  
7 statements accurate today?

8 MS. COUCH: Objection. Vague.  
9 Compound.

10 THE WITNESS: I said those two  
11 statements in the context of this long interview  
12 there.

13 BY MS. JONES:

14 Q. Sure. I understand. My question is:  
15 Are those two statements accurate today?

16 MS. COUCH: Objection. Vague.  
17 Compound.

18 THE WITNESS: I think I said those two  
19 statements in the context of that interview at that  
20 time.

21 BY MS. JONES:

22 Q. And does that mean that they're not --  
23 you don't view them as being accurate, sitting here  
24 today in your deposition under oath?

25 A. They're accurate in the context of that

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1 talk that I gave that day.

2 Q. And what you were drawing a distinction  
3 between there was the different content that an  
4 adolescent or a teen might actually encounter on  
5 social media, right?

6 MS. COUCH: Objection. Misstates.

7 THE WITNESS: If we looked at the  
8 broader context of this interview, I believe this  
9 was talking about how much time is too much, and I  
10 was responding that we cannot determine what amount  
11 of time is good or bad.

12 BY MS. JONES:

13 Q. Sure.

14 And the reason for that is because, as  
15 you said there, there's a difference between an  
16 adolescent having good, happy conversations with  
17 their close friends and an adolescent being exposed  
18 to cyberhate or something negative, right? There's  
19 a difference between those two things?

20 A. The broader context is that it is very  
21 complex, and we cannot necessarily make claims  
22 about a particular time cutoff that is good or bad.

23 Q. Understood. Let me -- let me just ask  
24 you the question.

25 Do you agree that there is a difference

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1 between an adolescent having what you described as  
2 good, happy conversations with close friends and an  
3 adolescent being exposed to cyberhate on social  
4 media? Do you acknowledge that those two things  
5 are different?

6 MS. COUCH: Objection. Vague.

7 THE WITNESS: I acknowledge that that  
8 is the statement from that clip.

9 BY MS. JONES:

10 Q. And do you acknowledge that they're  
11 different things? That if an adolescent  
12 experiences friendly interactions with people they  
13 know from school, that's different than if they  
14 experience cyberhate or some other kind of negative  
15 interaction?

16 MS. COUCH: Objection. Vague.

17 THE WITNESS: Those are two examples of  
18 things that can occur.

19 BY MS. JONES:

20 Q. Sure.

21 And that teenager's response to those  
22 different experiences might differ based on whether  
23 it's a positive, happy, collegial experience or a  
24 negative, unpleasant experience, right?

25 MS. COUCH: Objection. Vague.

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1 Hypothetical.

2 THE WITNESS: It's very hard to  
3 speculate beyond the small clip that you showed  
4 there.

5 BY MS. JONES:

6 Q. Okay. What -- what about the  
7 difference between a teen on social media seeing --  
8 say, they really like soccer -- seeing clips from  
9 the World Cup versus seeing violent content of some  
10 kind?

11 A. I'm sorry. Go ahead.

12 Q. Do you -- do you acknowledge that those  
13 are different types of content that a teen might  
14 experience?

15 MS. COUCH: Objection. Vague.

16 THE WITNESS: I would say this is a  
17 hypothetical that I don't think I am going to  
18 speculate upon.

19 BY MS. JONES:

20 Q. You don't -- you don't know if there's  
21 a difference between a teen encountering clips of  
22 soccer or basketball or some sport that he or she  
23 likes versus a teen encountering violent or abusive  
24 or hateful content on the Internet?

25 MS. COUCH: Objection. Argumentative.

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1 THE WITNESS: You're giving me just  
2 examples of things that they might be seeing on --  
3 BY MS. JONES:

4 Q. I am -- I am doing that. And I'm  
5 asking you, do you acknowledge here today that  
6 those are two different experiences?

7 MS. COUCH: Objection. Vague.

8 THE WITNESS: I acknowledge that you  
9 are giving me two examples of hypotheticals.

10 BY MS. JONES:

11 Q. Okay. And do you acknowledge that it's  
12 possible that a teen's reaction to those two forms  
13 of content could differ based on the content?

14 MS. COUCH: Objection. Vague.

15 THE WITNESS: I -- I'm not going to  
16 speculate about hypotheticals.

17 BY MS. JONES:

18 Q. Let me ask you: As part of your  
19 academic research, did you actually control for  
20 what adolescents were doing with their phone and  
21 seeing on their phones?

22 A. We are looking broadly across lots of  
23 different studies about their social media use.

24 MS. JONES: I'm going to move to strike  
25 as nonresponsive, respectfully.

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1 BY MS. JONES:

2 Q. My question was: As part of your  
3 academic research, have you actually controlled for  
4 what the adolescents who were participating in your  
5 study were doing with their phones and seeing on  
6 their phones?

7 MS. COUCH: Objection. Vague.

8 THE WITNESS: I mean, we've done a lot  
9 of research, looking at lots of different aspects  
10 of social media use. It's hard to answer that  
11 specific question without looking at a specific  
12 study.

13 BY MS. JONES:

14 Q. Well, let me hand you what we will mark  
15 as Exhibit Number 23.

16 (TELZER EXHIBIT 23, Article titled  
17 Linking video chatting, phone calling, text  
18 messaging, and social media with peers to  
19 adolescent connectedness, was marked for  
20 identification.)

21 BY MS. JONES:

22 Q. Do you recognize Exhibit Number 23,  
23 Dr. Telzer?

24 A. Yes.

25 Q. And Exhibit Number 23 is a paper

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1 published by yourself, Dr. Burnell and others in  
 2 2023, correct?  
 3 A. Yes.  
 4 Q. And the title of the article is  
 5 "Linking video chatting, phone calling, text  
 6 messaging, and social media with peers to  
 7 adolescent connectedness."  
 8 Do you see that?  
 9 A. Yes.  
 10 Q. And in general, your abstract here lays  
 11 out kind of the findings of the study -- right? --  
 12 in general terms?  
 13 A. Generally speaking, the abstract is  
 14 describing the study.  
 15 Q. I actually want to ask you about a very  
 16 specific portion of this paper, Page 1232.  
 17 A. Okay.  
 18 Q. Are you there?  
 19 A. Yes.  
 20 Q. And this is, again, in that  
 21 "Limitations and future directions" -- that  
 22 limitations section that we talked about earlier --  
 23 A. Yes.  
 24 Q. -- yes?  
 25 I want to direct your attention to the

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1 last paragraph in your "Limitations and future  
 2 directions" section. Are you there?  
 3 A. Future -- the "Future research"  
 4 paragraph?  
 5 Q. Yes.  
 6 A. Yes.  
 7 Q. It says: Future research should also  
 8 explore how engaging in specific digital media  
 9 behaviors impact adolescents' social connectedness.  
 10 Did I read that correctly?  
 11 A. Yes.  
 12 Q. You said: While we differentiated  
 13 between four types of digital media, we did not  
 14 have information about specific digital behaviors,  
 15 communications, or content exchanged.  
 16 Did I read that correctly?  
 17 A. Yes.  
 18 Q. Is that an accurate statement about the  
 19 work related to this particular study?  
 20 A. That statement that you read is  
 21 accurately written there.  
 22 Q. Are there any studies that you can  
 23 think of where you and your colleagues did, in  
 24 fact, collect information about specific digital  
 25 behaviors, communications or content exchanged?

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1 MS. COUCH: Objection.  
 2 BY MS. JONES:  
 3 Q. Actually, let me ask you a more  
 4 specific question.  
 5 Are there any studies that you can  
 6 think of that you have been involved in --  
 7 A. Uh-huh.  
 8 Q. -- where you and your colleagues  
 9 collected information about the specific content  
 10 exchanged by the adolescents who were participating  
 11 in the study?  
 12 A. Specific content? It's likely. I  
 13 can't think of it off the top of my head.  
 14 Q. When you say it's likely --  
 15 A. It's possible. I don't -- I don't know  
 16 off the top of my head is what I mean.  
 17 Q. Okay. All right. You go on to say in  
 18 the same paper: For example --  
 19 A. Uh-huh.  
 20 Q. -- one adolescent may have used a  
 21 social networking site to passively like pictures  
 22 posted of a friend, whereas another adolescent may  
 23 have used the same social networking site to host a  
 24 video chat with their friend--both of these teens  
 25 would report using social media to interact with a

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1 friend in our study.  
 2 Do you see that?  
 3 A. Yes.  
 4 Q. And that's an accurate statement?  
 5 A. You read that accurately.  
 6 Q. Okay. But was that also an accurate  
 7 statement?  
 8 A. That's what we --  
 9 MS. COUCH: Objection. Vague.  
 10 THE WITNESS: That is a statement we  
 11 have here.  
 12 BY MS. JONES:  
 13 Q. Okay. And you go on to say: However,  
 14 these different digital behaviors may divergently  
 15 impact adolescents' feelings of social  
 16 connectedness.  
 17 Did I read that correctly?  
 18 A. Yes.  
 19 Q. And is -- is that an accurate statement  
 20 of your -- you and your co-authors' views as  
 21 reflected in this 2023 paper?  
 22 MS. COUCH: Objection. Vague.  
 23 THE WITNESS: That is an accurate  
 24 statement that you read that is written in this  
 25 paper.

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1 BY MS. JONES:

2 Q. And what -- what this says is: These  
3 different digital behaviors may divergently impact  
4 adolescents' feelings of social connectedness.

5 What that means specifically is the  
6 different ways that an adolescent or teenager might  
7 be engaging with social media could differently  
8 affect how that adolescent felt on this measure of  
9 social connectedness that you all were focused on  
10 in this study, correct?

11 A. I guess here we are speculating about  
12 these different ways that adolescents are engaging  
13 with their friends online --

14 Q. Okay.

15 A. -- and how that might divert -- or how  
16 these different digital behaviors may divergently  
17 impact adolescents' feelings of social  
18 connectedness.

19 Q. And when -- when -- just to kind of  
20 talk about it in lay terms --

21 A. Uh-huh.

22 Q. -- when it refers to "divergently  
23 impact," what that means is "differently affect";  
24 is that right?

25 A. Divergent, yes. It means it could

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1 differently impact --

2 Q. Okay.

3 A. -- their feelings of social  
4 connectedness.

5 Q. I'm sorry for talking -- for talking  
6 over you.

7 Now, you used the word "I guess here we  
8 are speculating about these different ways that  
9 adolescents are engaging with their friends  
10 online."

11 In -- in terms of this kind of effort  
12 to be a cautious -- cautious researcher, do you  
13 speculate in peer-reviewed publications that you  
14 co-author?

15 MS. COUCH: Objection. Argumentative.

16 THE WITNESS: I think discussion  
17 sections are an opportunity to discuss and think  
18 about how our findings relate to the broader work  
19 and what possible, in a limitations and future  
20 directions section, what limitations or variables  
21 that we might consider.

22 MS. JONES: I'm, respectfully, going to  
23 move to strike as nonresponsive.

24 BY MS. JONES:

25 Q. My question was: In terms of your

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1 efforts to be a cautious researcher, do you  
2 speculate in peer -- peer-reviewed publications  
3 that you co-author?

4 MS. COUCH: Objection. Argumentative.

5 THE WITNESS: I think in a  
6 peer-reviewed publication one of the roles of a  
7 discussion is to think about what the results mean  
8 and to connect them to broader literature and think  
9 about different ways in which there may be  
10 limitations or different ways of answering  
11 questions.

12 BY MS. JONES:

13 Q. You talked yesterday and in your report  
14 about how different elements or features of social  
15 media -- I think the term you used was "exacerbate"  
16 potential harm from content on social media.

17 Am I generally recalling that  
18 correctly?

19 A. I don't recall what you're referring  
20 to.

21 Q. Okay. Well, yesterday we were having a  
22 conversation about doesn't content matter in terms  
23 of whether or not an adolescent or a teen might  
24 have some kind of effect, whether positive or  
25 negative, on social media.

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1 Do you recall that back-and-forth we  
2 had?

3 A. I recall discussing that, yes.

4 Q. Okay. And sitting here today, my  
5 recollection of your testimony yesterday was you  
6 believe that content matters. But it seems like  
7 you have determined that features matter more than  
8 the content; is that right?

9 A. My determination and opinions that I  
10 discuss in my report talk about how the features  
11 fundamentally change the experience of the content.

12 I gave some explicit examples. I would  
13 be happy to give those examples again of how those  
14 features, like the algorithms, the "like" features,  
15 can change the experience of the content.

16 Q. Sure. And I'm going to ask you about  
17 some of those examples, actually. But I -- I first  
18 want to make sure I understand.

19 You -- recognizing your opinions about  
20 the importance of the features --

21 A. Uh-huh.

22 Q. -- do you also acknowledge that  
23 content, whether you see a puppy versus seeing  
24 something violent and unpleasant on social media,  
25 can affect how you react to what you see?

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MS. COUCH: Objection. Vague.

THE WITNESS: I think that my opinions that I discuss in my report rely upon the broader literature that is content agnostic.

We are not necessarily examining or focusing on the content when I come to my opinions. We're looking at the broader literature and how especially those features that I discussed could fundamentally change that content, how experiences on social media can be changing adolescents' developing brains.

None of that is specifically focusing on these contents that you're discussing.

BY MS. JONES:

Q. Well, let me ask you about some of these features that you brought up, including the algorithms.

The algorithms on social media platforms are not simply showing blank screens to users, are they?

MS. COUCH: Objection. Hypothetical.

THE WITNESS: I don't -- I don't know what you mean by "blank screens."

BY MS. JONES:

Q. I mean, is the algorithm showing

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teenagers just blank screens?

MS. COUCH: Objection. Hypothetical.

THE WITNESS: I don't know what you mean by "blank screens."

BY MS. JONES:

Q. I mean a black screen with nothing on it.

A. The algorithms are feeding them feeds of what they're seeing on those social media platforms.

Q. And that could include pictures of some kind, right?

A. That can include pictures.

Q. That can include videos of some kind, right?

A. That can include videos.

Q. That could include some kind of, you know, post where there are words that have been communicated by someone, right?

A. A post with words? I don't know or speculate or -- I -- I would prefer some explicit examples, not --

Q. Are you on social media?

A. I am.

Q. Are you on -- what platforms?

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A. I have been on all platforms: Facebook, Instagram, YouTube, TikTok, Snapchat.

Q. Okay. Have you ever encountered, for example, a post on any one of those platforms where, you know, someone posts words where they're offering an inspirational quote or saying something funny or communicating in some way using language?

Are you familiar with that as someone who has used all of these platforms?

A. Probably.

Q. Okay. So I was talking about pictures and videos. And that third thing that I mentioned was sometimes what the algorithm shows you is, you know, somebody sends some kind of quote or lyrics to a song or something else.

A. Okay.

Q. Yes?

A. Sure. Yes.

Q. Okay. I mean, UNC, for example, has an Instagram page, yes?

A. I think so, yes.

Q. And so the university might use that as a way to communicate information about something that's going on at the school, right?

A. Yes.

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Q. Okay. And it could use that as a way to show people pictures from graduation or some other event that's exciting for people, yes?

A. Yes.

Q. It could use that as a way to show people videos of some kind, yes?

A. Uh-huh. Yes.

Q. Okay. So as someone who has actually used all these platforms, you know that the algorithm is not just showing you black boxes when you are looking at a -- a feed or a reel of some kind, right?

A. I know that the algorithms are designed to maximize user engagement. And so it is using those algorithms to feed different content and material to increase the -- the user's likelihood of engaging and spending more time on that app.

Q. Sure. And have you ever had any experience, as someone who has used these platforms, where you go in and the algorithm as you're scrolling through is just showing you nothing?

A. I have had experiences where I've gone on and algorithms have tailored the content so much that I get sucked in, and I have extreme use of

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1 social media in moments where I didn't want to.

2 Q. Okay. And that -- that's based on  
3 seeing something that is, you know, interesting or  
4 engaging or in some way something that gets you to  
5 look at more of it. Is that your experience?

6 MS. COUCH: Objection. Misstates her  
7 testimony.

8 THE WITNESS: As I said, I have gone on  
9 social media and the algorithms have altered the  
10 content that I'm seeing in such a way that it sucks  
11 me in and I spend more time on social media than I  
12 intended.

13 BY MS. JONES:

14 Q. Yeah. And just to go back to my  
15 original question. Have you ever gone on social  
16 media and looked at your feed and there was just  
17 nothing there?

18 A. No.

19 Q. You discuss notifications in your  
20 report. Am I recalling that correctly?

21 A. I discuss notifications.

22 Q. Okay. And notifications are not just  
23 wordless pings for people, right?

24 A. They're not what? Sorry.

25 Q. They're not just wordless alerts for

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1 people, right?

2 MS. COUCH: Objection. Vague.

3 THE WITNESS: What is a "word list"?

4 I'm sorry.

5 BY MS. JONES:

6 Q. Without any content to it.

7 Let me ask you the question this way.

8 Have you gotten notifications as part of being  
9 someone who is on some of these social media  
10 platforms?

11 A. No. I have turned off all  
12 notifications.

13 Q. Okay. Did you use to have  
14 notifications?

15 A. No.

16 Q. You've never had notifications on your  
17 social media?

18 A. Not that I recall.

19 Q. Do you have an awareness of whether,  
20 when adolescents or teenagers receive  
21 notifications, whether they're getting notified of  
22 certain information?

23 MS. COUCH: Objection. Vague.

24 THE WITNESS: I think that that is too  
25 vague to be able to understand.

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1 BY MS. JONES:

2 Q. Do -- do you think that a notification  
3 that reminds a teen to do homework would have the  
4 same effect on the teen as a notification that  
5 reminds that teen that there's a message from a  
6 friend waiting for them to review?

7 MS. COUCH: Objection. Outside the  
8 scope.

9 THE WITNESS: I have not thought about  
10 or discussed notifications in that way.

11 BY MS. JONES:

12 Q. So you don't know?

13 A. I can't answer that.

14 Q. Are you aware of any study on the  
15 effect of notifications for adolescents and teens  
16 that attempts to separate out the impact of the  
17 content of the notification from the notification  
18 itself?

19 A. I can't think off of the top of my  
20 head.

21 MS. COUCH: Since you've seemed to wrap  
22 up that section --

23 MS. JONES: Yes, I was --

24 MS. COUCH: -- we've been going an  
25 hour.

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1 MS. JONES: -- just going to say, we've  
2 been going an hour. So a break would be fine.

3 MS. COUCH: Thank you.

4 THE VIDEOGRAPHER: Going off the  
5 record. The time is 10:04 a.m.

6 \* \* \*

7 (Whereupon, there was a recess in the  
8 proceedings from 10:04 a.m. to 10:23 a.m.)

9 \* \* \*

10 THE VIDEOGRAPHER: Going back on the  
11 record. The time is 10:23 a.m.

12 (TELZER EXHIBIT 24, Research Article  
13 titled Teens on screens: A daily diary study of  
14 objectively-measured smartphone use, social media  
15 activity and associations with mood, was marked for  
16 identification.)

17 BY MS. JONES:

18 Q. Dr. Telzer, I'm going to hand you what  
19 we've marked as Deposition Exhibit Number 24.

20 Do you recognize Deposition Exhibit  
21 Number 24?

22 A. Yes. This is the Haag data or the  
23 under review paper.

24 Q. And just for the record, Deposition  
25 Exhibit Number 24 is a paper that was actually

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submitted earlier that is pending final publication; is that right?

A. It's under review edit.

Q. Okay. Got it.

And you were one of the authors on this paper, Exhibit 24, correct?

A. Correct.

Q. The title of the paper is "Teens on screens: A daily diary study of objectively-measured smartphone use, social media activity and associations with mood," correct?

A. Correct.

Q. And I just had a question for you. Where it says "PDF Generation, April 29th, 2025," the significance of that date is what; do you know? If you don't, that's fine. I was just curious.

A. I don't know where you see that. I'm sorry.

Q. It's -- I'm sorry. It's up in the kind of top third of the first page.

A. Which --

Q. The very first page. Do you see where the heading is, the title, and then "Submission ID," "Submission Version," "PDF Generation"?

A. I -- I don't know. I'm sorry.

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Q. May I see your copy. I wonder if we're, perhaps, looking at different -- oh, yeah, right here. See where it says "PDF Generation"?

A. Yes.

Q. I was just asking -- and I truly am just asking to ask -- do you know what that date signifies?

A. I don't know.

Q. Okay. This paper, which is under review as of today, is based on objective data collected by you and your colleagues in 2020; is that right?

A. I believe that's the date. Yes.

Q. And do you rely on this data for -- to support, in part, recognizing that you rely on other data, to support your opinions in your expert report in this case?

A. My opinion does not rely singularly on this paper. This paper was used to help demonstrate some of the patterns of social media use that are consistent with a host of other publications, like Common Sense Media, The Pew Research, as well as other publications that have shown trends in how much adolescents are using social media.

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Q. Sure.

And my question was not: Do you rely on it singularly? My question was: Is this body of data some of which you rely on as part of your opinions in your written report?

MS. COUCH: Asked and answered.

THE WITNESS: This paper along with a host of our research that shows consistent patterns demonstrating how much adolescents are using social media, including research conducted by Common Sense Media and Pew Research to demonstrate how much adolescents are using social media.

BY MS. JONES:

Q. Okay. I don't want to fuss about this because it's a small point. Let's go to Page 12 of 40. And I am looking -- there are two sets of page numbers. I'm looking at the far upper-right ones. So 12 of --

A. Yeah.

Q. Which I was told was the absolute page numbering by someone who knows better than I.

There is a section entitled "Measures" on that page; is that right?

A. Yes.

Q. Okay. And there's a description of

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objective measures of smartphone use, correct?

A. Yes.

Q. And if you look at the second sentence in that section or paragraph, it says: As in previous studies, participants accessed this data through their iPhone settings app, then selecting "See All Activity" within "Screen Time" and taking three screenshots of their overall screen time, their top three most-used apps and websites, and their top three most-used app categories from the entire day before.

Did I read that correctly?

A. Yes.

Q. In the context of gathering this data, did you and your co-authors actually also gather data -- and if you didn't, it's fine -- but did you also gather data on what specific content the participants in the study were seeing?

MS. COUCH: Objection. Vague.

THE WITNESS: I can't recall off the top of my head.

BY MS. JONES:

Q. That's not reflected here, in any event?

A. That's not reflected in these measures?

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Q. Yes.

A. No.

Q. And you say you can't recall off the top of your head. Does that mean you think you might have done that and you're just not remembering it today, or you didn't do it?

A. It means we collected lots of different measures, and I don't recall what all of the measures are we collected.

Q. One of the things that you note in this paper under submission for 2025 -- in 2025 is that the data were collected in 2020 during COVID while school were -- schools were closed?

A. Are you referencing something specific?

Q. I'm certainly happy to show you where it says that.

A. Uh-huh.

Q. If you go to Page 8.

MS. COUCH: And, Dr. Telzer --

BY MS. JONES:

Q. Actually -- I'm sorry. It's actually--

MS. COUCH: -- if you need a minute to orient yourself, please take it.

THE WITNESS: Uh-huh.

BY MS. JONES:

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Q. I'm actually -- I gave you the wrong number. It's Page 11 in --

A. Yeah.

Q. -- the top number. You know where it is. Okay.

A. Got it. Yep.

Q. Under "Procedure," it says: The current study was conducted virtually during the COVID-19 pandemic in the summer of 2020. Right?

A. That's when the study started, yes.

Q. And you and your co-authors mention in this manuscript submitted for review that that was an -- that was a limitation of the data?

A. Can you point me to that, please?

Q. Sure. Go to Page 26 of 40. Up at the top of the page.

A. Uh-huh.

Q. And I may have said "limitation." I just simply meant to note that you and your co-authors had noted that.

At the top of the page at 26 of 40, it says: It is important to note the data presented here were collected during the first summer of COVID-19 pandemic --

A. It says that.

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Q. I'm sorry. I missed a word. So I want to read it accurately --

A. Okay.

Q. -- so I can be sure that I can fairly ask you if it's accurate.

It is important to note the data presented here were collected during the first summer of the COVID-19 pandemic, and thereby seems in line with recent research revealing increases in smartphone and other media in the U.S. and worldwide among adolescents during this period.

Is that an accurate statement?

A. You read that correctly.

Q. Okay. Let me ask you to go to -- excuse me. I'm just getting to my page. Let me ask you to go to Page 24 of 40.

A. Okay.

Q. And this reflects an overview of your -- you and your colleagues' findings as to mood and social media use; is that right?

A. The heading there is "Mood and Social Media Use."

Q. And in the second paragraph of that discussion, it says: Between-person correlations of impacts on mood and objectively assessed social

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media use time are presented in Table 6.

These correlations suggest that adolescents who reported that, on average, social media had less of a positive impact on their mood and more of a negative impact on their mood spent more time on social media, on average, across days.

Did I read that correctly?

A. You read that correctly.

Q. And is that an accurate statement?

A. That is accurate statement right there.

Q. And then it goes on to say: However, correlation coefficients indicate only weak associations.

Did I read that correctly?

A. You did.

Q. And is that an accurate statement?

A. That's accurate as written there.

Q. And then at the bottom of that same paragraph, it says: Thus, while we did observe significant between-person associations, contrary to H4a, no significant associations were found at the within-person level.

Did I read that correctly?

A. You read that correctly.

Q. And is that -- is that an accurate

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1 statement --

2 MS. COUCH: Objection. Vague.

3 BY MS. JONES:

4 Q. -- as to that particular finding in  
5 your study?

6 MS. COUCH: Same objection.

7 THE WITNESS: That is a correct  
8 sentence right there that you read, yes.

9 BY MS. JONES:

10 Q. And so that means that when you were  
11 evaluating adolescents participating in the study  
12 and evaluating within-person associations in  
13 particular, you found nothing; is that right?

14 MS. COUCH: Object to the form.  
15 Misstates the study.

16 THE WITNESS: Let me look at the  
17 results.

18 BY MS. JONES:

19 Q. Sure. Please.

20 A. I think we are referring to Table 6  
21 results. Table 6 results are correlations among  
22 time spent on social media and their indication of  
23 how much did social media have a positive mood on  
24 you and how much did social media have a negative  
25 mood on you. And the within-person correlation

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1 does not reach statistical significance.

2 Q. Okay. And so you all did not have a  
3 finding of an association within-person -- in terms  
4 of a within-person association between social media  
5 use and mood, correct?

6 MS. COUCH: Objection. Vague.

7 THE WITNESS: We did not find a  
8 correlation between objectively measured time spent  
9 on social media and the question: How much did  
10 social media have a positive impact on your mood?

11 BY MS. JONES:

12 Q. Okay. And I just want to make sure.  
13 Are we saying different things?

14 A. It's --

15 MS. COUCH: Objection. Vague.

16 THE WITNESS: -- a slightly different  
17 way of asking the question.

18 We're -- I'm being very specific about  
19 the full question of what was asked to adolescents,  
20 their subjective feeling of whether they think  
21 social media had a positive impact or a negative  
22 impact on their mood.

23 BY MS. JONES:

24 Q. And the same question with respect to  
25 how much did social media have a negative impact on

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1 your mood.

2 If we're looking at Page 23 of 40,  
3 Table 6, there were questions about how much did  
4 social media have a positive impact on your mood,  
5 as you've referenced.

6 A. Uh-huh.

7 Q. Correct? Yes?

8 A. Yes.

9 Q. And then there was also a question  
10 about how much did social media have a negative  
11 impact on your mood, correct?

12 A. Yes.

13 Q. And did that finding rise to the level  
14 of statistical significance?

15 A. That -- that association is not  
16 significant at the within-person level.

17 Q. Okay. So there were -- and just the  
18 nutshell version just for lay folks.

19 A. Uh-huh.

20 Q. When you say "within-person," you mean  
21 what, specifically?

22 A. Yeah. So when we're talking about  
23 between- and within-person analyses,  
24 "between-person analyses" mean that we're comparing  
25 adolescents -- groups of adolescents to each other.

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1 So an average, an adolescent -- one  
2 adolescent who spends less time on social media  
3 compared to an adolescent who spends more time on  
4 social media, how much is that related on average  
5 to these feelings of how much social media had a  
6 positive or negative impact on their mood.

7 When we're talking about "within-person  
8 analyses," we're talking about an adolescent  
9 relative to themselves and how much an increase or  
10 decrease in objectively measured time spent on  
11 social media across the 14 days of measurement, how  
12 much that fluctuates within themselves with that  
13 question of: How much did social media have a  
14 positive or a negative impact on your mood?

15 Q. Okay. And so as to either positive or  
16 negative impact on an individual participant's mood  
17 in this study, you all did not find an association,  
18 correct?

19 A. At the within-person level, that  
20 analysis does not reach statistical significance.

21 Q. Now, I know that this was -- was this  
22 paper -- when was this paper submitted for review?

23 A. I don't recall.

24 Q. Was it before your expert report in the  
25 JCCP was signed?

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1 A. I don't.

2 Q. Do you know?

3 A. I don't recall.

4 Q. Okay. Your -- I think your JCCP report  
5 dated April 18th, 2025, does not discuss this  
6 paper. Am I recalling that correctly?

7 And just to be fully transparent, I  
8 think it's discussed in your MDL report but not in  
9 your JCCP report. Does that --

10 A. Yeah, I relied upon -- I think I went  
11 back and made some corrections, including  
12 referencing this citation. I believe it is in the  
13 JCCP report, and it was fixed for the MDL report.

14 Q. In your JCCP report, did you report on  
15 this specific finding from this very recently  
16 submitted paper under review right now that there  
17 was not a significant within-person association  
18 found between objectively reported social media use  
19 and positive or negative impact on mood?

20 A. For the purposes of my report and this  
21 specific publication, I was not reporting those  
22 specific analyses but looking at the data that  
23 helps us to understand how much adolescents are on  
24 social media, how much time they spend on the  
25 different platforms, how many notifications they're

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1 getting, and how often they're picking up their  
2 phones.

3 MS. JONES: And my -- my question, I  
4 think, was different. So I'm going to move to  
5 strike as nonresponsive.

6 BY MS. JONES:

7 Q. My question was simply: Did you  
8 indicate in your report for the JCCP dated  
9 April 18th, 2025, about the findings of this very  
10 recently submitted manuscript that, among other  
11 things, reports that: We looked specifically  
12 about -- at whether there was an association  
13 between objectively measured social media use and  
14 whether there was a negative or a positive effect  
15 on mood, and the in-person -- the within-person  
16 analysis did not find an association?

17 Did you report on that in your written  
18 report in this case?

19 MS. COUCH: Asked and answered.

20 THE WITNESS: In my report, I relied on  
21 this paper to discuss the frequency and quantity  
22 with which adolescents are using social media,  
23 including how often they're using social media, how  
24 many notifications they're getting, and how often  
25 they're picking up their phones.

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1 BY MS. JONES:

2 Q. Do you -- do you think that that  
3 additional finding that you and your colleagues in  
4 a very recently submitted paper found no  
5 association is an important finding to communicate  
6 as part of your overall analysis in your written  
7 report?

8 MS. COUCH: Objection. Misstates the  
9 paper.

10 THE WITNESS: My overall report relies  
11 upon all of the totality of the research, my  
12 experiences working with adolescents and my teen  
13 advisory board, the hundreds of other publications  
14 that I have looked at and reviewed, all of the  
15 publications that I have had. This singular  
16 finding does not change my opinions.

17 BY MS. JONES:

18 Q. Well, I understand it doesn't change  
19 your opinion. My question was really: Do you  
20 think it is appropriate to include that finding  
21 among the other things that you included in your  
22 very expansive report?

23 MS. COUCH: Asked and answered.  
24 Argumentative.

25 THE WITNESS: For the -- for the

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1 purposes of my report and using this publication, I  
2 relied on the publication for the descriptive data  
3 showing the quantity with which adolescents are  
4 using social media, including how frequently they  
5 are picking up their phone, getting notifications  
6 and spending time on the different platforms.

7 BY MS. JONES:

8 Q. So you're not relying on this paper for  
9 purposes of trying to determine whether there is an  
10 association in either direction, positive or  
11 negative, between objectively measured social media  
12 use and reporting on mood effects --

13 MS. COUCH: Objection.

14 BY MS. JONES:

15 Q. -- in terms of within-person analysis?

16 MS. COUCH: Objection. Calls for legal  
17 reasoning.

18 THE WITNESS: All of the things that I  
19 have relied upon contribute to my overall opinions.  
20 BY MS. JONES:

21 Q. That -- that -- that finding, that --  
22 that's a -- the one that we talked about on Page 24  
23 of 40, that is an accurate reporting of what you  
24 and your colleagues found in this particular study?

25 MS. COUCH: Objection. Vague.

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1 THE WITNESS: We accurately report that  
2 the association between objective social media use  
3 and adolescents' answer to the question of how good  
4 or bad did social media make you feel is not  
5 statistically significant at the within-person  
6 level.

7 BY MS. JONES:

8 Q. Let me ask you about one other thing in  
9 this paper. On Page 32 of 40 --

10 MS. JONES: Actually, strike that.

11 BY MS. JONES:

12 Q. Let me take a step back.

13 You -- when did -- you said you didn't  
14 remember when this paper was submitted; is that  
15 right?

16 A. I don't recall, no.

17 Q. Do you remember when it was kind of  
18 finalized for purposes of submission as among you  
19 and your co-authors?

20 MS. COUCH: Objection. Vague.

21 THE WITNESS: I believe we -- we  
22 submitted this paper, actually, years ago.

23 BY MS. JONES:

24 Q. What does "years ago" mean?

25 A. I don't recall the specific date,

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1 but...

2 Q. Was it before or after 2023?

3 A. I don't recall. But it was years ago  
4 when it was first submitted.

5 Q. Okay. Well, let me ask you about 32 of  
6 40, the Page 32 of 40. There is a conflict of  
7 interest statement section in this manuscript,  
8 correct?

9 A. Correct.

10 Q. And it says: The authors declare there  
11 is no conflict of interest regarding the  
12 publication of this article, right?

13 A. That's there, yes.

14 Q. And what you told me yesterday about  
15 the Flannery 2024 paper, I believe, if I'm  
16 recalling correctly, was that you had not made a  
17 conflict of interest disclosure but you probably  
18 should have.

19 MS. COUCH: Objection. Misstates  
20 testimony.

21 BY MS. JONES:

22 Q. Is that what you told me yesterday?

23 MS. COUCH: Same objection.

24 THE WITNESS: I told you yesterday that  
25 that paper was submitted and accepted prior to my

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1 full understanding of the scope of my work on this  
2 and that I, in hindsight, should have submitted a  
3 conflict of interest.

4 BY MS. JONES:

5 Q. Okay. Would you have the same view on  
6 reporting on a conflict of interest in terms of  
7 your paid litigation work for plaintiffs' counsel  
8 in connection with this manuscript?

9 MS. COUCH: Objection. Calls for  
10 speculation.

11 THE WITNESS: Once the conflicts of  
12 interest forms, when this is accepted at a journal,  
13 come out, I will absolutely submit the conflicts of  
14 interest.

15 BY MS. JONES:

16 Q. Well, when you -- when -- do you know  
17 if you had been retained by counsel when you filled  
18 out this portion of the conflicts of interest  
19 statement when it was submitted?

20 MS. COUCH: Objection. Calls for  
21 speculation.

22 THE WITNESS: I don't recall.

23 BY MS. JONES:

24 Q. But it sounds like you're committing  
25 today that when you eventually -- when this is

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1 eventually published somewhere that we are going to  
2 see in the conflicts of interest statement that you  
3 have disclosed --

4 A. Absolutely.

5 Q. -- that you have been retained for  
6 litigation?

7 A. I will absolutely disclose this to the  
8 journal when it is accepted for publication.

9 Q. Let me ask you to go to Page 7 of your  
10 report. And on Page 7 of your report, one of the  
11 things that you say -- it's actually the last  
12 bullet before your -- your "Professional Background  
13 and Experience" section that starts with:  
14 Parenting has changed with the advent of social  
15 media.

16 A. Uh-huh.

17 Q. Do you see that?

18 A. I do.

19 Q. And at the end of that bullet, it says:  
20 It is critical that tech companies fully inform  
21 parents and children of the true risks of their  
22 platform so that informed decisions can be made as  
23 a family.

24 Do you see that?

25 A. I do.

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Q. Are you offering -- I just wanted to make sure we understood kind of the nature of your opinions.

A. Uh-huh.

Q. Are you offering the opinion in this case that the social media defendants involved in the case need to provide some kind of warning to parents or teenagers who are using their platforms?

A. Based on discussions with parents and teenagers, as well as much of the data that I include at the end of the report about parent experiences, understanding the risks and harms of social media, not understanding and having the sort of digital gap in their understanding of it, they're coming to me very frequently, quite frankly, fearful and not knowing what to do about it, oftentimes uninformed and not even understanding the scope of the risks.

It is my opinion that they need to be informed about the risks and harms of social media so that they can make informed decisions in their parenting.

Q. Sure.

And my question, just to be a little bit more granular, is whether you are offering the

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opinion that the defendants in this case, Meta, YouTube, Snap, TikTok, need to provide a warning as part of their platforms.

MS. COUCH: Asked and answered.

THE WITNESS: Parents are terrified and don't feel that they have the tools to navigate social media. Many of them are unaware of the harms, as I've talked about in here and much of the data provided at the end of my report.

Parents are scared but don't have the tools, don't have the awareness to navigate these platforms. And they should absolutely be informed of those risks so that they can navigate their parenting effectively.

BY MS. JONES:

Q. Informed by who?

A. It would be great if the tech companies were fully informing parents of all of the risks of their platforms.

Q. And are you offering a specific opinion on that point, that tech companies need to be fully informing parents by way of a warning of all of the risks of their platforms?

MS. COUCH: Asked and answered.

THE WITNESS: I'm saying that parents

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are coming to me in discussions terrified about how to navigate social media. They feel uninformed. They don't know how to navigate it. They're seeing the risks.

The data that I report in the end of my report on parenting shows they don't know what is happening. And it is my opinion that it is critical that they are fully informed about the risks of these platforms so that they can make informed decisions as parents.

MS. JONES: I'm going to move to strike as nonresponsive, with respect, because we're all on a clock here.

BY MS. JONES:

Q. Have you, as part of your work in this case -- I didn't see it in your report -- actually created a specific warning that you think needs to be associated with any of the platforms that are at issue in this litigation?

A. That is out of the scope of my work.

Q. Have you ever had any involvement in creating a warning of any kind for any kind of product?

A. That is out of the scope of my work.

Q. Have you ever worked with any kind of

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government agency or regulatory body on developing a warning for any type of product?

A. We're working right now with the entire school districts across North Carolina to collect data across thousands of adolescents in order to work with them to help make guidelines for technology use in schools.

Q. Anything beyond that?

A. Not that I can think of.

Q. Are you aware of any technology company, whether a social media company or some other type of media company, that provides a warning of some sort?

A. I think that's too broad. I'm not sure.

Q. You don't know? Okay. Well, let me give you an example.

There are, for example, video-streaming services like Netflix or Amazon Prime or Apple TV that show video content, yes?

A. Can you ask that -- reask that? I don't know what you're asking.

Q. Are you not aware of the existence of Netflix?

A. I'm aware of the existence of Netflix.

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1 Q. And Apple TV?

2 A. And Apple TV.

3 Q. And Amazon Prime?

4 A. Amazon Prime.

5 Q. And you understand that all those

6 platforms show video content of various kinds?

7 A. Sure.

8 Q. Movies?

9 A. Movies.

10 Q. Television shows?

11 A. Yes.

12 Q. And you understand that on platforms,

13 including those, including some others, that there

14 is a way to have an autoplay function; that once

15 you finish one episode of a television show,

16 something else will automatically start playing?

17 A. I'm aware of that.

18 Q. Okay. And some people, including

19 teenagers, spend hours a day watching

20 video-streaming services, correct?

21 MS. COUCH: Objection. Assumes facts

22 not in evidence.

23 THE WITNESS: I would have to see the

24 data.

25 BY MS. JONES:

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1 Q. Do you know?

2 A. Not off the top of my head.

3 Q. Okay. If that were the -- well, if

4 that were the case, do you think there should be a

5 warning on that?

6 MS. COUCH: Objection. Calls for

7 speculation.

8 THE WITNESS: I would have to see the

9 full research in order to determine that.

10 BY MS. JONES:

11 Q. You're not -- you're not suggesting

12 that there should be a warning associated with

13 video-streaming services, it sounds like?

14 MS. COUCH: Same objection.

15 THE WITNESS: I'm not speculating to

16 what these other platforms or video-, TV-streaming

17 services should do.

18 BY MS. JONES:

19 Q. Did you know that the three platforms

20 that we are talking about, video-streaming

21 platforms and others like them, use notifications

22 to alert folks who might subscribe to them to new

23 movies or shows or episodes? Did you know that?

24 MS. COUCH: Objection. Calls for

25 conjecture.

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1 THE WITNESS: Did I know what? Sorry.

2 BY MS. JONES:

3 Q. Did you know --

4 A. That these platforms --

5 Q. Let me ask the question again.

6 Did you know that the three platforms

7 that we're talking about, video-streaming platforms

8 and others like them, use notifications to alert

9 users to new movies and television shows and

10 episodes of different television shows? Did you

11 know that?

12 MS. COUCH: Same objection.

13 THE WITNESS: I'm sorry. You're --

14 you're asking about, like, Amazon Prime and

15 Netflix?

16 BY MS. JONES:

17 Q. Yeah.

18 A. I don't know.

19 Q. Okay. Cell phones themselves, do you

20 own a cell phone?

21 A. I do.

22 Q. What kind of cell phone?

23 A. An iPhone.

24 Q. Okay. Cell phones provide all kinds of

25 notifications to people who carry them, right?

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1 MS. COUCH: Objection. Outside the

2 scope.

3 THE WITNESS: My iPhone has the

4 possibility of notifications on it.

5 BY MS. JONES:

6 Q. Okay. Including -- and if a teenager

7 has an iPhone, that iPhone may well be equipped to

8 provide text and call notifications, right?

9 A. Generally speaking, iPhones can send

10 notifications about texts.

11 Q. And those -- those notifications could

12 interrupt studying or school or sleeping?

13 MS. COUCH: Objection. Calls for

14 conjecture.

15 THE WITNESS: That's speculative and

16 beyond the scope of what I am talking about in my

17 report.

18 BY MS. JONES:

19 Q. You don't know?

20 A. I -- as I said, it's speculative.

21 Phones -- phones certainly have notifications.

22 Q. All right. And your own research shows

23 that for some students non-social media smartphone

24 use is equal to or greater than social media

25 smartphone use; isn't that right?

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1 A. I would have to see the specific  
2 example.

3 Q. You don't know that, sitting here  
4 today?

5 A. In order to confirm what you're saying,  
6 I need to see the example.

7 Q. Cyberbullying can occur on cell phones  
8 through text messaging and on Reddit forums and in  
9 other platforms beyond social media, correct?

10 MS. COUCH: Objection. Compound.

11 THE WITNESS: You're saying -- you're  
12 asking if cyberbullying can occur on other  
13 platforms?

14 BY MS. JONES:

15 Q. Yes.

16 A. Cyberbullying can occur on other  
17 platforms.

18 Q. Are you offering an opinion that  
19 smartphones should carry a warning of some kind?

20 A. That is not part of my opinion.

21 Q. Are you offering an opinion that the  
22 iMessage app should carry a warning of some kind?

23 A. I'm not making opinions beyond what are  
24 in here, in my report.

25 Q. What about a forum like Reddit?

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1 A. I'm not speculating on other platforms  
2 in my report.

3 Q. Dr. Telzer, let me ask you to go to  
4 what we're going to mark as Exhibit Number 25. I'm  
5 going to hand it to you. I apologize. You don't  
6 have it.

7 (TELZER EXHIBIT 25, Document titled  
8 "Addiction" to Facebook: A Literature Review,  
9 Bates META3047MDL-005-00000001-13, was marked for  
10 identification.)

11 BY MS. JONES:

12 Q. And Exhibit Number -- if you remember,  
13 Exhibit Number 25 is an example of one of the  
14 company documents for Meta platforms that you cite  
15 in your written report.

16 And if you -- I'm happy to show you  
17 the -- the page, if it's helpful.

18 A. Yes, I would like to see the page.

19 Q. Yeah, sure. Let me get the right page  
20 so I can steer you to it. Oh, 51, Ms. Antoine  
21 kindly informs me.

22 And on Page 51, down at the bottom of  
23 the page, there's a Footnote Number 10.

24 Do you see that?

25 A. Yes.

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1 Q. And one of the citations is to what I  
2 think I described to you yesterday -- this is a  
3 lawyer terminology -- a Bates number that starts  
4 with "TIKTOK."

5 Do you see that? In the report, sorry.

6 A. Yes.

7 Q. The first item at 10 is "TIKTOK." And  
8 then the second document is the document that I've  
9 just showed you, META3074MDL. And it ends with  
10 005, and the last -- very last number is 1, yes?

11 A. Yes.

12 Q. And do you recognize that reference at  
13 Footnote 10 in your written report to be the  
14 document that I've handed you as Exhibit Number 25?

15 A. Sorry. I'm having trouble connecting  
16 the two with those two numbers. Can you help me  
17 understand?

18 Q. Sure. Yeah, yeah, yeah. Sure.

19 If you look at the number that you cite  
20 at Footnote 10 --

21 A. Yep.

22 Q. -- of your report.

23 A. Yeah.

24 Q. Down at the bottom --

25 A. Oh, I see.

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1 Q. -- of Exhibit Number 25, there is --  
2 again, lawyer term -- a Bates number that, if you  
3 check it, should correspond to that number.

4 A. Yes. I was looking at the wrong  
5 number. I see that now. Yes.

6 Q. No, that's fair. And you specifically  
7 cite that document -- I'm just getting myself to  
8 the right point.

9 If you look at the reference up earlier  
10 in the text itself, you cite that document in  
11 support of a sentence that says: YouTube's  
12 internal documents demonstrate that "a feed in a  
13 teen session can have a high volume of videos that  
14 repeat the same message." Meta and ByteDance  
15 studies reflect similar conclusions as well.

16 Do you see that?

17 A. Uh-huh.

18 Q. You have to say "yes" or "no."

19 A. Yes. Sorry.

20 Q. That's okay. And I want to ask you  
21 about your treatment of this particular document,  
22 Number -- excuse me -- Exhibit Number 25.

23 A. Yes.

24 Q. Do you feel -- actually, let's start  
25 with just kind of some level-setting.

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At the top of Exhibit Number 25, you see that that refers to [REDACTED], yes?

A. Uh-huh. Yes.

Q. And do you know who [REDACTED] is?

A. I don't recall.

Q. Do you know anything about what his role was at the company?

A. I don't recall.

Q. Okay. And so just so I understand and we generally understand, in terms of this document, you're just reading the words on the page. You're not saying that you know what [REDACTED] was thinking at the time, right?

A. In the context of this paper, I'd be reading, yes, what's on this paper.

Q. You were just reading the words. Okay.

So let me, actually, talk about a couple of things that you didn't specifically cite in your report, if I could.

And you -- you should hold on to your report because I wanted to refer you to what you specifically quote at Footnote 10.

You say: "If algorithms favor content or functionality that encourages people to spend

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more time on Facebook, then it's possible that" -- excuse me -- "then it's possible that this will, by its nature, tap into addictive mechanisms." Correct?

A. I see that, yes.

Q. All right. And then you did not actually include, in terms of fully describing what is reflected in this document, Exhibit Number 25, what Mr. [REDACTED] said, right?

A. I need to rereview the -- the document. I did not include the entire document there.

Q. Well, let -- let me just ask you about a couple of items. You see that there is a section entitled "Limitations/Notes"?

A. I see that.

Q. And in the second bullet, he says: I'll use "addiction" as a brief term for this spectrum of problematic use of Facebook, but it's not clear that "addiction" is the correct term.

Do you see that?

A. I see that.

Q. We may want to adopt a more generic term going forward.

Did you include that language anywhere in your report?

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A. That is not in my report.

Q. Okay. And then if you go to the third page, under the FAQ section?

A. Uh-huh.

Q. About midway down, it says: Are algorithms to blame?

Do you see that?

A. I do.

Q. And that's where you're pulling this quote from -- that's referred to in Footnote 10, correct?

A. Yes. Correct.

Q. So -- so Mr. [REDACTED] wrote in this document: Are algorithms to blame?

You included one sentence in his response, but you didn't include the entirety of his response, right?

A. That is correct.

Q. You did not include the first part of his answer, which says? Research hasn't addressed this. Correct?

A. Correct.

Q. And you also did not include the part where he said: The result could be to make addictive/compulsive usage more severe and more

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widespread. But none of the above studies have examined this in any way. Right?

A. That is what that says right there, yes.

Q. You did not quote those additional portions of Mr. [REDACTED] answer in the reference that you have in your report, correct?

A. Correct.

Q. Are you certain -- are there other examples of company documents that you have excerpted in that way?

MS. COUCH: Objection. Broad. Argumentative.

THE WITNESS: I am not sure.

BY MS. JONES:

Q. How did you decide what you were going to quote or not quote in your report?

A. I'm not sure.

Q. Let me wrap up because I have to pass you along to my colleagues here, so we'll take a break before we do that.

You don't have a degree in computer science; is that right?

A. I do not have a degree in computer science.

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Q. Have you -- do you have any expertise in reading or understanding code for a social media platform?

A. I do not understand the code of a social media platform.

Q. Have you ever designed an -- an application of any kind? A digital media application?

A. I have not designed a digital media application.

Q. Have you ever been involved in the design of an algorithm?

A. I have not been involved in the design of an algorithm.

Q. Have you reviewed the source code for the algorithm for -- that's used by any of the defendants in this case?

A. I have not reviewed their source code.

Q. And you don't have the -- in fairness to you, you have qualifications for many things.

But you don't have the qualifications necessary to go and look at the underlying source code for the algorithms that might be associated with any of the defendants' platforms, correct?

A. I could not look at source code for an

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algorithm, no.

MS. JONES: Why don't we take a break. I think somebody else is going to be here when we get back.

THE WITNESS: Okay.

THE VIDEOGRAPHER: Going off the record. The time is 11:02 a.m.

\* \* \*

(Whereupon, there was a recess in the proceedings from 11:02 a.m. to 11:21 a.m.)

\* \* \*

THE VIDEOGRAPHER: Going back on the record. The time is 11:21 a.m.

\* \* \*

EXAMINATION

BY MS. EHLER:

Q. Hi, Dr. Telzer. I'm Rose Ehler. I'm an attorney for Snap in these cases. Thank you for your time.

So we covered this a little bit yesterday. But I wanted to make sure that as it relates to Snap in particular, your opinions regarding Snapchat and Snap are disclosed in your April 18's JCCP report for purposes of this JCCP case; is that right?

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MS. COUCH: Objection. Calls for legal reasoning.

THE WITNESS: I'm not sure what you mean by my opinions on Snap are "disclosed."

BY MS. EHLER:

Q. The opinions that you're offering in this case regarding Snapchat, you set those out in writing in that report, right?

MS. COUCH: Objection. Calls for legal reasoning.

THE WITNESS: All --

MS. COUCH: I don't --

THE WITNESS: Sorry.

MS. COUCH: Let me just make a very quick objection. I don't want to get into it.

I think we know that there is a dispute before the Court on Monday in the CMC statements.

MS. EHLER: Great. I just want the --

MS. COUCH: Our position is stated there. And so my objection from here on out, I'll just say, "Objection. Calls for legal reasoning," but it would include that.

MS. EHLER: Great.

MS. COUCH: Okay.

MS. EHLER: I'm just asking for the

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witness's testimony as to your understanding of the opinions that you're offering as it relates to Snapchat.

BY MS. EHLER:

Q. Do you have any opinions that are not outlined in writing in your report?

A. I'm not sure I understand what you're asking. All of my opinions are outlined in my report right here.

Q. That's all I'm asking.

A. Okay.

Q. It's not a trick question.

A. Yeah.

Q. Just trying to figure out that if there's -- your report is silent on something or there's not something in your report, there isn't some lurking secret opinion that, sitting here today, you're aware of.

MS. COUCH: Objection. Vague.

THE WITNESS: I don't have secret opinions, no.

BY MS. EHLER:

Q. Great. That's it.

Do you know Dr. Nick Allen at the University of Oregon?

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1 A. Yes.

2 Q. Do you hold him in high regard?

3 A. Yes.

4 MS. COUCH: Objection. Vague.

5 THE WITNESS: Sorry.

6 BY MS. EHLER:

7 Q. Did you read his expert reports in this

8 case?

9 A. I looked at them, yes.

10 Q. This follows from our prior discussion,

11 but you don't have any specific opinions in

12 responding to what he wrote other than what you set

13 forth in your report, correct?

14 A. I may have specific responses. I

15 didn't prepare those for today, no.

16 Q. That's fine.

17 Sitting here today, is there anything

18 in particular you would like to respond to Dr. Nick

19 Allen?

20 A. Not at this point, no.

21 Q. What is your salary as a professor at

22 UNC?

23 MS. COUCH: Objection.

24 BY MS. EHLER:

25 Q. It can be ballpark --

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1 MS. COUCH: It could be harassment.

2 BY MS. EHLER:

3 Q. -- amount you make.

4 A. I have what's called a "nine-month

5 salary"; and on top of that, summer salary; and on

6 top of that, a stipend.

7 Q. That's very helpful.

8 On an annual basis, about how much of

9 that total? Too, I'm not trying to get into

10 specifics. Just trying to get a rough sense.

11 MS. COUCH: Objection. Calls for

12 speculation.

13 THE WITNESS: I can't give you the

14 exact number off the top of my head.

15 BY MS. EHLER:

16 Q. If somebody asked you, "About how much

17 do you make a year?" what would you tell them?

18 A. It depends, because I have a nine-month

19 salary, all of which is publicly available, if you

20 looked it up, as well as summer salary and some

21 stipends on top of that.

22 Q. Okay. We didn't. For 2024, do you

23 know about -- about how much you made?

24 A. I don't.

25 Q. You have no idea?

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1 A. I don't know.

2 Q. But we could look that up?

3 A. You can look that up.

4 Q. Yesterday, you talked about how your

5 opinions regarding the harms of social media have

6 evolved in recent months, and I think you used the

7 phrase "there was sort of mounting evidence." Do

8 you recall that testimony?

9 A. I don't recall --

10 MS. COUCH: Same objection.

11 THE WITNESS: I'm sorry.

12 MS. COUCH: Go ahead.

13 THE WITNESS: I don't recall exactly

14 that.

15 BY MS. EHLER:

16 Q. Okay. But the opinions you hold

17 regarding social media as set forth in your report,

18 you expressed that those had -- you'd become more

19 confident in those in recent time, no?

20 A. I would say that my opinions in here

21 are based upon a totality of all of this research,

22 which is over a decade of experience in the field,

23 doing the research, talking to adolescents, talking

24 to parents, going into schools, conducting fMRI

25 research, looking at all of the underlying defense

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1 documents, as well as looking at the broader

2 literature. And all of those inform my decision or

3 my opinions put forth in my report.

4 Q. Okay. And those have never changed?

5 A. My opinion --

6 MS. COUCH: Objection. Speculative.

7 Go ahead.

8 THE WITNESS: My opinions are what I

9 have here.

10 BY MS. EHLER:

11 Q. Okay. My question was different.

12 My question was whether or not they've

13 evolved or changed in recent months. And I was

14 just -- that is what I understood you to testify to

15 yesterday. But if that's not the case, that's

16 fine.

17 Just trying to get an answer to my

18 question of whether your opinions have changed more

19 recently or you've always held those opinions that

20 are set forth in your report.

21 MS. COUCH: Objection. Vague.

22 Speculative.

23 THE WITNESS: The opinions that I set

24 forth in my report are based upon the research that

25 I have done over decades, as well as reading the

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1 literature, as well as looking at the underlying  
2 defense documents. And those informed the opinions  
3 that I set forth in this report.

4 BY MS. EHLER:

5 Q. As of the date of that report?

6 A. That is the date that that report was  
7 submitted.

8 Q. Okay. Have you specifically reached  
9 out to any public health official or authorities to  
10 share the opinions -- not anything that's highly  
11 confidential, but the opinions at a general level  
12 set forth in your report?

13 A. I've probably talked to public health  
14 individuals, yes.

15 Q. Who?

16 A. I've given lots of talks across the  
17 nation in medical settings, in school settings  
18 where public health individuals may be present and  
19 hearing the research that I do.

20 I present very regularly showing that  
21 social media is changing the developing brain and  
22 have presented that to hundreds of audiences,  
23 ranging from medical professionals to public health  
24 individuals to adolescents and teachers.

25 Q. My question is different.

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1 Do you -- do you specifically reach out  
2 to any public health authorities or officials to  
3 tell them about the concerns that social media is  
4 harming adolescents' mental health?

5 MS. COUCH: Asked and answered.

6 THE WITNESS: I have given lots of  
7 talks to these communities, ranging from doctors  
8 and clinicians to public health individuals to  
9 teachers and teenagers, discussing many of the  
10 harms of social media, including that social media  
11 is changing the developing brain. And that is a  
12 consistent message that I discuss across hundreds  
13 of talks and populations and individuals that I  
14 communicate with.

15 MS. EHLER: I'll move to strike as  
16 nonresponsive.

17 BY MS. EHLER:

18 Q. My question is: Have you specifically  
19 reached out to public health authorities for the  
20 express purpose -- not that they may have been in  
21 the audience of a talk -- for the express purpose  
22 of telling them about the conclusions that social  
23 media harms mental health -- adolescents' mental  
24 health?

25 MS. COUCH: Asked and answered. Vague.

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1 THE WITNESS: I have given and  
2 communicated with and talked to many audiences and  
3 expressed that social media causes harms and that,  
4 in particular, there are effects of social media in  
5 changing the brain across adolescent development.

6 BY MS. EHLER:

7 Q. You know you're not answering my  
8 question, right?

9 A. I'm answering your question.

10 MS. COUCH: Objection. Argumentative.

11 BY MS. EHLER:

12 Q. I just want to know if -- if you are  
13 aware that I asked a different question than the  
14 question you keep answering. Are you aware of  
15 that?

16 MS. COUCH: Objection. Argumentative.

17 THE WITNESS: I'm answering your  
18 question.

19 BY MS. EHLER:

20 Q. You're not.

21 MS. COUCH: Argumentative. But not a  
22 question pending, so I guess no objection.

23 BY MS. EHLER:

24 Q. Do you have any names of specific  
25 public health authorities that you have spoken with

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1 directly on the issues outlined in your report?

2 A. Not off the top of my head.

3 Q. Do you know who the current U.S.  
4 Surgeon General is?

5 A. I don't think I know his name or her  
6 name or their name.

7 Q. So I take it you haven't reached out to  
8 that person, correct?

9 A. I have not talked to that person.

10 Q. You spoke yesterday about adolescents  
11 that have self-reported to you that they're  
12 addicted to social media. Do you remember that  
13 testimony?

14 A. I've had lots of adolescents come and  
15 talk to me about social media addiction.

16 Q. Great. Those are the people I'm  
17 talking about. Have you told any of those  
18 individuals to seek professional treatment for  
19 their addiction?

20 A. I have lots of advice that I have given  
21 teenagers, ranging from helping them to identify  
22 problematic use that they may have, to using and  
23 having better tools to navigate social media in a  
24 healthier way, if they can, to completely delaying  
25 and not using social media.

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1 Q. Is that a "no" to my question, which is  
2 whether you've specifically told any of those  
3 individuals to seek professional treatment for  
4 their addiction?

5 A. In my role as a scientist, I disclose  
6 and discuss the scientific findings and the advice  
7 that I can give based on that science, which  
8 includes screening tools and advice on problematic  
9 social media use and ways of helping them navigate  
10 social media in a way that could help them not have  
11 such high levels of addiction -- addictive  
12 behavior, as well as to avoid it altogether.

13 Q. Is that a "no" to the answer -- is that  
14 a "no" as the answer to my question?

15 MS. COUCH: Asked and answered.

16 THE WITNESS: As I said, as a scientist  
17 and researcher, my role in talking to adolescents  
18 is discussing the science to them and the tools  
19 that I can provide them based on the broader  
20 literature, including tools for identifying  
21 problematic social media use as well as ways to  
22 navigate social media use in a way to try to  
23 minimize the addictive nature of it and avoiding it  
24 altogether.

25 MS. EHLE: I'll move to strike,

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1 respectfully, as nonresponsive.

2 And I'll just note for the record and  
3 for your counsel that if we do need to seek more  
4 time, all of these answers are going before the  
5 judge, because it's using up the time that we  
6 agreed to, on nonresponsive answers.

7 MS. COUCH: I'm comfortable with her  
8 responses. I think she is listening to your  
9 question.

10 MS. EHLE: Great.

11 MS. COUCH: I think she's giving a full  
12 answer. You've had 11 hours. Go forth.

13 BY MS. EHLE:

14 Q. Can you answer "yes" or "no" to the  
15 question whether you have advised any particular  
16 individual of the teens in your studies who  
17 self-reported to be addicted to social media that  
18 they should seek professional treatment? Can you  
19 answer "yes" or "no" to that question?

20 MS. COUCH: Objection. Vague.  
21 Misstates her testimony.

22 THE WITNESS: As a scientist and a  
23 researcher, when I am talking to adolescents who  
24 express social media addiction, I tell them about  
25 the tools and scientific findings that we have and

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1 ways to identify problematic use to screen for that  
2 to avoid some of the addictive features of social  
3 media and to avoid social media altogether.

4 BY MS. EHLE:

5 Q. Great.

6 MS. EHLE: And I will just note for  
7 the record a motion for sanctions on that  
8 particular answer.

9 MS. COUCH: You can make your motion in  
10 writing.

11 I think she answered it. You're asking  
12 her what advice she has given to --

13 MS. EHLE: Well --

14 MS. COUCH: Well, actually, she never  
15 said she gave advice to people in her study. So  
16 that was the misstatement objection.

17 MS. EHLE: Counsel. Counsel, there's  
18 not a question pending, and that's not an  
19 objection.

20 MS. COUCH: I know. But I'm  
21 entitled --

22 BY MS. EHLE:

23 Q. Have you --

24 MS. COUCH: -- to respond to make my  
25 record, too.

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1 MS. EHLE: Fair enough.

2 BY MS. EHLE:

3 Q. Have you recommended to any of the  
4 teens in your studies who self-reported that  
5 they're addicted to social media that they should  
6 bring a lawsuit against Snap or the other platforms  
7 in this case?

8 A. I have not discussed that with  
9 adolescents.

10 Q. Do you believe that social media should  
11 be banned?

12 A. I believe, in the current state of  
13 social media and the current features that there  
14 are, that social media is unsafe for adolescents.

15 In its current state, it is not safe.  
16 I don't think it is likely a feasible or possible  
17 thing to ban it. But I don't think that  
18 adolescents at any age or for any reason should be  
19 on social media.

20 Q. Is that a "yes"?

21 MS. COUCH: Objection. Misstates her  
22 answer.

23 THE WITNESS: As I said, in its current  
24 form I believe that social media is unsafe for  
25 adolescents given all of the features that make it

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1 an unhealthy, unsafe environment for them.

2 I don't believe it is necessarily  
3 possible to implement bans, and therefore I think  
4 no adolescent should be on social media.

5 BY MS. EHLER:

6 Q. What about adults? Do you think social  
7 media should be banned for adults?

8 A. I think social media is unhealthy and  
9 unsafe at any age, especially for adolescents. I  
10 don't recommend adults to be on it either.

11 Q. You mentioned earlier that you have a  
12 Snapchat account; is that right?

13 A. Yes.

14 Q. What is the username or handle or --

15 A. I don't recall.

16 Q. You don't recall?

17 A. I don't recall.

18 Q. When was the last time you used it?

19 A. A few days ago.

20 Q. And you don't recall your name?

21 A. I don't recall.

22 Q. How long in total number of hours have  
23 you spent using Snapchat?

24 A. A couple hours.

25 Q. Total?

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1 A. Uh-huh.

2 Q. Were those in the last few days?

3 A. Over the last couple weeks.

4 Q. Before the last couple of weeks, had  
5 you never used Snapchat before?

6 A. No, I had not.

7 Q. Have you used Snapchat to send a Snap  
8 or a chat to someone else?

9 A. I have not.

10 Q. Have you used Snapchat to view a story  
11 or any other video on Snapchat?

12 A. I have.

13 Q. Have you ever used a Snapchat filter?

14 A. I have.

15 Q. Have you ever had a Streak with a  
16 friend on Snapchat?

17 A. I have not.

18 Q. Have you viewed ephemeral content on  
19 Snapchat?

20 A. I have.

21 Q. What was the ephemeral content you  
22 viewed?

23 A. The stream of -- of -- I looked through  
24 the streams of videos that are on there.

25 Q. And did you believe those to be

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1 ephemeral?

2 A. Sure.

3 Q. Did your use of Snapchat in -- for a  
4 few hours in the last couple of weeks harm your  
5 mental health?

6 MS. COUCH: Objection. Vague.

7 THE WITNESS: I don't know how Snapchat  
8 affected my mental health.

9 BY MS. EHLER:

10 Q. So then, I take it, you didn't seek any  
11 professional help or anything as it related to that  
12 usage of Snapchat?

13 A. I did not seek professional help.

14 Q. I apologize for the personal question,  
15 but I wanted to confirm. You're not a parent of a  
16 teenager, correct?

17 A. I'm not a parent of a teenager.

18 Q. Based on your use of Snapchat in the  
19 last few weeks, when a -- are you aware of what a  
20 user sees when they open the Snapchat app?

21 A. Based on my exploration of the app  
22 myself, I have a general understanding of how and  
23 what users see.

24 Q. What is that when you first open the  
25 app? What does the user see?

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1 A. There is the little emoji person,  
2 whatever you call them, that you've developed.  
3 There is a screen where you can create selfies.  
4 There's the geolocation map. There is, along the  
5 bottom, little things to see the videos -- the  
6 video streaming.

7 Q. And you said it opens to a -- something  
8 you can create selfies. By that, do you mean a  
9 camera?

10 A. I believe so.

11 Q. Do you know why it opens to a camera?

12 A. I can't speculate on why it opens to a  
13 camera.

14 Q. You said that you haven't used the  
15 Snapchat feature "Streaks." Can you give me a  
16 rough sense of how -- how you understand that  
17 feature to work?

18 A. Yeah, sure. So from my understanding  
19 of reading a lot of the internal documents,  
20 adolescents are sending each other messages. Those  
21 need to be kept up on a daily basis in order to  
22 keep those Streaks.

23 Adolescents are striving for higher  
24 Streaks. I've read internal documents that  
25 adolescents who are losing their Streaks are

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1 writing to Snap indicating that they are suicidal  
2 and want those Streaks back.

3 Q. Are you aware that a user has to  
4 initiate and pursue a Streak with another  
5 individual, like a friend?

6 MS. COUCH: Objection. Vague.

7 THE WITNESS: I don't know what you  
8 mean by that.

9 BY MS. EHLER:

10 Q. Do you think it just happens  
11 automatically?

12 MS. COUCH: Objection. Vague.

13 THE WITNESS: I think that adolescents  
14 are striving for those Streaks. That is a  
15 rewarding feature of the design.

16 BY MS. EHLER:

17 Q. Right. And my question is about the  
18 design. Do you think it happens automatically when  
19 users are communicating with each other, or do you  
20 think it's something a user needs to initiate?

21 MS. COUCH: Objection. Vague.

22 THE WITNESS: I don't know if I  
23 understand that.

24 BY MS. EHLER:

25 Q. Okay. How long does it take for a teen

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1 to maintain a Streak on any given day?

2 A. I -- I think -- the broad understanding  
3 I have is that they need to send a -- a message on  
4 a daily basis.

5 Q. How much time does that take?

6 A. I have no idea how much time a message  
7 takes.

8 Q. Seconds?

9 A. I can't speculate on how much time it  
10 takes to send messages.

11 Q. You said you sent -- oh. No. You said  
12 you did not send.

13 A. I did not.

14 Q. Okay. So you don't know if it's  
15 seconds or minutes or hours?

16 A. I have no idea how long it takes  
17 adolescents to construct a -- a message.

18 Q. Are you aware of other apps, besides  
19 Snapchat and the other defendants in this case,  
20 that use Streaks?

21 A. I don't know about other platforms  
22 beyond the ones we're talking about today.

23 Q. Do you think that if there are other  
24 apps that have a similar "Streaks" feature that  
25 they would necessarily be harmful in the same way

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1 that you claim Snapchat is harmful here?

2 MS. COUCH: Objection. Vague.

3 THE WITNESS: I can't speculate.  
4 I'm sorry.

5 MS. COUCH: Go ahead.

6 THE WITNESS: I can't speculate on  
7 things outside of the scope of what we're talking  
8 about in these platforms.

9 BY MS. EHLER:

10 Q. Have you ever used Duolingo?

11 A. I don't know what that is.

12 Q. Headspace?

13 A. I don't know what that is.

14 Q. Do you know what Spotlight is?

15 A. I can't recall off the top of my head.

16 Q. As it relates to Snapchat?

17 A. It sounds familiar, but I can't recall  
18 off the top of my head.

19 Q. What about the Discover feature?

20 A. I don't think I could describe it off  
21 the top of my head.

22 Q. Do you know if Snap's -- Snapchat has a  
23 "like" feature?

24 A. It's my understanding Snapchat, similar  
25 to all the other platforms we're talking about

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1 today, share many of the same features, including a  
2 feature where there is that quantification.

3 Q. Do you know if those are publicly  
4 visible on Snapchat?

5 A. I don't know.

6 Q. Do you know if there are other publicly  
7 visible metrics --

8 MS. EHLER: Strike that.

9 BY MS. EHLER:

10 Q. Do you know the average age of a  
11 Snapchat user?

12 A. Not off the top of my head.

13 Q. What do you think it is?

14 MS. COUCH: Objection. Calls for  
15 speculation.

16 THE WITNESS: I can't speculate or  
17 guesstimate.

18 BY MS. EHLER:

19 Q. Not relevant to your analysis?

20 A. I -- I'm not going to make a  
21 guesstimate here.

22 Q. Do you know how much time Snapchat  
23 users spend messaging versus engaging with other  
24 aspects of the Snapchat platform?

25 A. I don't know if I could give you a

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1 specific number, no.

2 Q. That's not something you studied?

3 A. We've looked at the amount of time that  
4 adolescents are spending on Snap.

5 Q. But you don't have any research that  
6 looks at what they're doing on Snapchat, whether  
7 it's messaging or engaging with a different feature  
8 on the platform?

9 A. I don't think that we look at the data  
10 in that way. We're looking at our data in  
11 social -- our social media much more broadly. Most  
12 of the work that we're doing is looking at these  
13 features, very broadly speaking. We're looking at  
14 social media in adolescents' daily lives. I'm not  
15 necessarily looking at a specific feature of a  
16 specific platform in my work.

17 Q. So you don't know whether, as a general  
18 matter, adolescents use Snapchat more for messaging  
19 and more akin to an iMessage or for other purposes?

20 MS. COUCH: Objection. Vague.

21 THE WITNESS: I don't know that, nor do  
22 I think that it matters for my opinions in this  
23 case.

24 BY MS. EHLER:

25 Q. Do you believe that text messaging

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1 negatively impacts teens' mental health?

2 A. Text messaging as in a text messaging  
3 app on a phone or messaging through a platform?

4 Q. The -- using -- if someone's on an  
5 iPhone and the iMessage native text messaging app?

6 A. I think it probably could have a  
7 negative mental health effect on an adolescent.

8 Q. Do you think it's to the same degree as  
9 Snapchat?

10 A. I mean, I don't think I can speculate  
11 about text messaging in this moment. I'm, really,  
12 in my opinions, focusing on the features and how  
13 those features are fundamentally shaping  
14 adolescents' experiences on these platforms. I  
15 don't think the text messaging is relevant here.

16 Q. Well, with all due respect, you don't  
17 get to decide what's relevant here.

18 And my question was whether you think  
19 that text messaging impacts teens' mental health in  
20 a negative way to the same degree as you hold the  
21 opinion as it relates to Snapchat. Do you have a  
22 view on that question? It's okay if you don't.

23 MS. COUCH: Argumentative. Compound.

24 THE WITNESS: In the context of my  
25 report and my opinions, the text messaging app is

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1 not relevant to my opinions.

2 BY MS. EHLER:

3 Q. Is that a "you don't have a view on  
4 that, sitting here today"?

5 A. As I indicated, in the context of my  
6 report and my opinions, which are specific about  
7 these social media apps and the features of those  
8 social media apps, I am focusing on that today.

9 Q. Okay. Do you believe that online  
10 communication has a positive effect on adolescents'  
11 mental health?

12 MS. COUCH: Objection. Vague.

13 THE WITNESS: That is a largely vague  
14 question that would be hard to answer without more  
15 specifics.

16 BY MS. EHLER:

17 Q. More specifically, do you believe that  
18 using an app to communicate with peers could  
19 provide adolescents with a sense of social  
20 connectedness?

21 A. We do have data from my own lab showing  
22 that in moments when adolescents are using  
23 social -- social media to connect with friends,  
24 they feel more connected.

25 Q. And that's a positive thing, right?

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1 A. It can be a positive thing. I think in  
2 the handbook that I edited, we talk about how  
3 social connection can sometimes be positive but it  
4 can also be negative.

5 Q. In the research that you've done on  
6 this, which I think is Exhibit 23, the Garrett  
7 paper from 2023 that we looked at earlier -- do you  
8 recall this one?

9 A. Yes.

10 Q. -- did you note any ways in which -- or  
11 do you recall, sitting here today, noting any ways  
12 in which using social media apps for social  
13 connectedness would be a negative thing?

14 A. I'd have to go back through to see if  
15 we qualified anything about social connection  
16 beyond saying that the findings show that they're  
17 socially connected.

18 MS. COUCH: And you said Exhibit 23,  
19 Rose?

20 MS. EHLER: Yeah.

21 BY MS. EHLER:

22 Q. Would you agree that social  
23 connectedness provides adolescents with  
24 companionship, belonging, a sense of affiliation  
25 within the context of their social environment?

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1 A. I would say, in the context of this  
2 study, we can't speculate to what social connection  
3 means in all of those domains.

4 Q. Is one of the findings of that study  
5 that digital communications can be leveraged to  
6 support adolescents' social well-being?

7 A. Can you point me to that?

8 Q. Sure. Page 1232. It's the paragraph  
9 on the -- are you on 1232?

10 A. Yes.

11 Q. So it's about halfway through the  
12 paragraph in the top right -- sorry -- top left of  
13 that page.

14 There's a sentence that says: In line  
15 with other recent studies, our results suggest  
16 these digital modes of communication may be  
17 leveraged to support increased social  
18 connectedness.

19 A. One minute. I'm not finding that  
20 sentence. It starts with "In line"? Oh, I see  
21 that. I see it. Sorry. I see that. Yes.

22 Q. Does that conclusion apply to text  
23 messages?

24 A. I need to read this in the broader  
25 context, please. I feel like there's more nuances

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1 here that are important to go into.

2 Q. Your attorney can ask you about those  
3 nuances.

4 My question is simply whether the  
5 conclusions that we just talked about regarding  
6 suggesting that digital modes of communication can  
7 be leveraged to support increased social  
8 connectedness applied to text messages.

9 MS. COUCH: Objection. Argumentative.

10 THE WITNESS: I mean, I think prior in  
11 this paragraph, we're saying that in the moments  
12 that adolescents are using social media, they're  
13 showing increased social connection but that this  
14 is not lasting across their overall daily social  
15 well-being.

16 MS. EHLE: I'll move to strike as  
17 nonresponsive.

18 BY MS. EHLE:

19 Q. I'll just ask the question.

20 Outside of that article, do you agree  
21 that text messages could be leveraged to support  
22 increased social connectedness with teens?

23 A. This is outside of the scope of my  
24 opinions focusing on these social media platforms.

25 MS. EHLE: I'll move to strike as

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1 nonresponsive to my question.

2 BY MS. EHLE:

3 Q. Do you agree that text messages could  
4 be leveraged to support increased social  
5 connectedness with teens?

6 A. These are outside of the scope of the  
7 research that I've done for this report.

8 Q. So you have no opinion on that?

9 A. Not in the context of my report and  
10 opinions today.

11 Q. Do you think that messaging via  
12 Snapchat could be leveraged to support increased  
13 social connectedness with teens?

14 A. I think in this specific paper, we  
15 say --

16 Q. Go ahead.

17 A. -- we say that social -- we say that  
18 sentence that you say: In line with other recent  
19 studies, our results suggest that these digital  
20 modes of communication may be leveraged to support  
21 increased social connectedness.

22 Q. Do you hold that as a general view?

23 MS. COUCH: Objection. Vague.

24 THE WITNESS: I hold that in line with  
25 the specific finding of this paper in which it

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1 refers to.

2 BY MS. EHLE:

3 Q. You can put that down, Dr. Telzer.

4 We've spoken about the research  
5 your lab does with a group of teens in rural  
6 North Carolina. And we talked about the data you  
7 collected from May to September in 2020. And I  
8 know there have been multiple waves of data  
9 collected from that school and that group of teens  
10 over time.

11 Does that -- I'm just trying to orient  
12 you. Does that ring a bell, that --

13 A. Yeah.

14 Q. -- that discussion?

15 A. We have a cohort of adolescents we've  
16 been following --

17 Q. Exactly.

18 A. -- over many waves.

19 Q. And that research sample you talk about  
20 in your report, too. Is that a "yes"?

21 A. Yes.

22 Q. Is there a overall study protocol that  
23 governs what you're asking those teens over time?

24 MS. COUCH: Objection. Vague.

25 THE WITNESS: I don't know what you

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mean by an "overall study protocol."

BY MS. EHLER:

Q. Are there documents where you set forth the sorts of questions and hypotheses and other research that you're doing with that cohort of teens over time?

MS. COUCH: Objection. Vague.

THE WITNESS: I -- there are documents that we use to collect our data and make sure that we're collecting it in rigorous and -- so that we can replicate across the different waves of data collection.

BY MS. EHLER:

Q. And is there, like, a code book or a data dictionary or something like that that -- that helps people who are new to the research, since it's been going on for several years, understand what you've done and what you're doing?

MS. COUCH: Objection. Vague. Compound.

THE WITNESS: We have different code books for the data.

BY MS. EHLER:

Q. And I believe as part of that data, you're collecting objective screenshot data through

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ExpiWell; is that right?

A. That is the platform that we use to collect the EMAs and for them to submit their screenshots.

Q. Okay. Is that kept somewhere?

MS. COUCH: Objection. Vague.

BY MS. EHLER:

Q. The data?

A. The data or ExpiWell?

Q. Is ExpiWell the platform on which that data is kept?

A. It is -- is collected on ExpiWell, and then we download it off of ExpiWell.

Q. Got it.

And then that data is available to you in your lab?

A. That data is on a server.

Q. And that's the data that you were relying on when you were talking about the research sample and findings in your report?

MS. COUCH: Objection. Broad. Vague.

THE WITNESS: There's lots of different pieces of data.

BY MS. EHLER:

Q. Was some of that data drawn from that

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same pool of data for purposes of your report in this case?

MS. COUCH: Objection. Vague.

THE WITNESS: I -- I'd need a more specific question. Sorry.

BY MS. EHLER:

Q. Did the data that you referenced in your research sample and research findings for the JCCP report that came from the same cohort of students in rural North Carolina schools, is that the same data that we were just talking about that you said is downloaded from ExpiWell?

A. There is data that we downloaded on ExpiWell that provides us with the objective measures of social media use that we used in the publications that are in many of these documents.

Q. And so then there's other data, too, right?

A. We have lots of data.

Q. Have you done other statistical analyses on that data that are not published in -- that are not in your report or published in the publications we discussed?

A. There may be forthcoming papers that are in prep or current students' master's, for

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example.

Q. Are any of those relevant to this case?

MS. COUCH: And just to be clear to shortchange it, she's only offering opinions based upon --

MS. EHLER: There's a question pending.

MS. COUCH: I'm just trying to be -- let me state this for the record.

MS. EHLER: No. There's a question pending.

Are you going to object?

MS. COUCH: Yes.

MS. EHLER: You can object.

MS. COUCH: I'm going to object. I'm hoping --

MS. EHLER: But you can't coach her what to answer about whether or not it's relevant.

MS. COUCH: I'm not coaching her. I'm talking to you, the counsel. And I'm telling you that we're not going to be using any additional forthcoming papers for the report. I assumed you would appreciate that.

MS. EHLER: Great.

BY MS. EHLER:

Q. So there's nothing else that's relevant

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1 in any of your forthcoming research to the opinions  
2 that you've set forth or this case?

3 A. I don't need any additional data for  
4 analyses that we are collecting for the purposes of  
5 my report. We have lots of ongoing studies that  
6 are, quote/unquote, relevant because we study  
7 social media and the developing brain.

8 Q. By my count in your report -- I was  
9 only able to identify five Snapchat -- Snap  
10 internal company documents that are actually cited  
11 in the text of your report.

12 I know you looked at it last night and  
13 you looked at some company documents. Does that  
14 sound right to you?

15 A. Regardless of how many I cited within  
16 the report itself, I considered all of the  
17 documents that are in my materials considered list.

18 MS. EHLER: Not my question. And I'll  
19 move to strike, respectfully.

20 BY MS. EHLER:

21 Q. I counted five that you were actually  
22 citing in the text of your report out of the other  
23 ones on your materials considered list.

24 Does that -- citing five in the text of  
25 your report sound right to you? Or do you think

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1 you cited more or less or you have no idea?

2 A. I don't know how many I cited within  
3 the body of my report. But all of the ones that  
4 are within my materials considered list are part of  
5 and contribute to my overall understanding of Snap  
6 and the opinions that I came to.

7 Q. Okay. And they're all equally  
8 relevant? So the ones that you cite in your report  
9 are no more or less relevant to your opinions than  
10 everything else on that materials considered list?

11 MS. COUCH: Objection. Calls for legal  
12 reasoning.

13 THE WITNESS: Many of the -- the  
14 documents I considered are relevant.

15 BY MS. EHLER:

16 Q. Okay. How did you choose the ones you  
17 were going to cite in the text of your report  
18 versus the ones that were on -- that were just left  
19 on the materials considered list?

20 A. It was a matter of time to submit the  
21 report and include a few, but the broader -- those  
22 were just examples of a few of the documents that  
23 support my opinions.

24 But my opinions are based upon the  
25 totality of the research that I did in those

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1 documents in the materials considered list.

2 Q. Were they intended to be representative  
3 examples or just picked to support the points that  
4 you -- --

5 A. They're just -- sorry.

6 Q. -- that you were citing them for in the  
7 report?

8 A. They're just a -- a few examples that I  
9 used to help support some of my things in the  
10 report.

11 (TELZER EXHIBIT 26, Document titled  
12 Final Report, Healthy Interactions Research  
13 Prepared February 2023, Bates SNAP0404262-318, was  
14 marked for identification.)

15 BY MS. EHLER:

16 Q. Okay. Let's look at one of those.

17 MS. EHLER: This will be Exhibit 26.  
18 And this is Bates-labeled SNAP0404262.

19 BY MS. EHLER:

20 Q. Do you recognize this document?

21 A. It looks -- yes. I believe so.

22 Q. Was this one of the ones you reviewed  
23 last night?

24 A. I don't believe this is one of the ones  
25 I looked at last night.

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1 Q. The ones you looked at last night, were  
2 those selected by you or by counsel?

3 A. By myself.

4 Q. Excuse me?

5 A. By myself.

6 Q. I just didn't hear you.

7 A. Yeah.

8 Q. Can you please --

9 MS. EHLER: Oh. I'm going to mark this  
10 portion of the transcript "Highly Confidential"  
11 because this is a internal Snap document that is  
12 marked "Highly Confidential."

13 BY MS. EHLER:

14 Q. Can you please turn to Page -- at the  
15 bottom there are numbers. We call these "Bates  
16 labels." The one -- the one that ends in the  
17 number 272. It's about ten pages into the  
18 document.

19 A. I think I'm there. It says  
20 "Connection"?

21 Q. Uh-huh.

22 A. Yeah.

23 Q. Okay. Do you see, in the last bullet  
24 under "Why It's Positive," it says: SMES:  
25 Sometimes it's a person's only friend; it can help

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1 with social anxiety?

2 A. Yes, I see that.

3 Q. Online connections can ease transition  
4 to face-to-face interaction (already know them)?

5 A. I see that.

6 Q. That is not an aspect of this document  
7 that you chose to cite in your report, right?

8 A. I just need a minute to look at the  
9 broader paper, please.

10 Okay. In my report, I don't  
11 necessarily quote or refer to a specific page. But  
12 it is in my materials considered list.

13 Q. Well, this document is actually cited  
14 in the text of your report.

15 A. Okay.

16 Q. And it might -- and I didn't see any  
17 reference to Snapchat internal documents having  
18 information that the app can actually be used to  
19 help with social anxiety in your report. And I  
20 just want to make sure I didn't miss anything.

21 A. Can you -- I'm not sure what page  
22 you're on in my report to refer to this document.

23 Q. Yeah, that's fair. And I don't have it  
24 in front of me either.

25 But operating off of your recollection,

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1 do you think, if there were positive descriptions  
2 of Snapchat and its impact on teens' mental health  
3 in these internal documents, that you would have  
4 cited those in your report?

5 MS. COUCH: Objection. Broad. Calls  
6 for conjecture.

7 THE WITNESS: It's included in my  
8 materials considered. So it is something that  
9 contributed to my overall opinions.

10 BY MS. EHLER:

11 Q. The positive aspects that were reported  
12 in internal documents?

13 A. I reviewed these documents.

14 Q. Why didn't you specifically mention  
15 that there were positive aspects of the platforms  
16 reported in internal company documents in the text  
17 of your report?

18 MS. COUCH: Objection. Broad. Assumes  
19 facts not in evidence.

20 THE WITNESS: I'd like to be able to  
21 look at a specific example to --

22 BY MS. EHLER:

23 Q. Well, I just -- we just -- we're  
24 looking at one at the bottom of Page Bates Label  
25 272.

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1 And you agree with me that this  
2 statement's not in your report, right?

3 A. It's probably not in my report. But I  
4 was trying to look for where I refer to this  
5 document.

6 Q. I can find it for you on a break. I  
7 don't want to take your time.

8 But my question is whether you think  
9 you referenced other positive aspects of -- that  
10 were reported on the Snapchat platform from the  
11 internal documents in your report.

12 MS. COUCH: Objection. Vague. Calls  
13 for conjecture.

14 THE WITNESS: I'm not sure. I may not  
15 have specifically referenced this specific quote in  
16 my report.

17 BY MS. EHLER:

18 Q. Was there a reason for that?

19 MS. COUCH: Objection. Vague. Calls  
20 for speculation.

21 THE WITNESS: Amongst all of the many,  
22 many documents I reviewed, I just gave some very  
23 small examples.

24 BY MS. EHLER:

25 Q. But not the positive ones?

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1 MS. COUCH: Objection. Vague.  
2 Argumentative.

3 THE WITNESS: I gave the examples that  
4 you can see in my report.

5 BY MS. EHLER:

6 Q. Great.

7 MS. EHLER: I am done questioning. Why  
8 don't we go off the record for a minute to play  
9 musical chairs.

10 THE VIDEOGRAPHER: Going off the  
11 record. The time is 12:04 p.m.

12 \* \* \*

13 (Whereupon, there was a recess in the  
14 proceedings from 12:04 p.m. to 12:45 p.m.)

15 \* \* \*

16 THE VIDEOGRAPHER: Going back on the  
17 record. The time is 12:45 p.m.

18 \* \* \*

19 EXAMINATION

20 BY MS. WADHWANI:

21 Q. Good afternoon, Dr. Telzer.

22 A. Hi.

23 Q. My name is Neelum Wadhwani. We met  
24 yesterday. I represent Google and YouTube.

25 Are you ready to proceed?

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1 A. Yes.

2 Q. Dr. Telzer, do you use YouTube?

3 A. Yes, I have used YouTube.

4 Q. For what purposes?

5 A. I have used it for looking up videos.

6 Q. Entertainment videos? News videos?

7 What kind of videos?

8 A. Lots of different kinds of videos.

9 Q. How often do you use YouTube?

10 A. I would say I use it somewhat

11 regularly.

12 Q. Daily? Weekly?

13 A. Weekly.

14 Q. When did you start using YouTube?

15 A. I don't think I can recall when I

16 started.

17 Q. Has it been several years?

18 A. Yes.

19 Q. About ten years?

20 A. I -- I have no idea about ten years. I

21 don't know.

22 Q. Okay. But for a good long while, you

23 would say?

24 A. Yes, a long time.

25 Q. Okay. Do you post videos to YouTube?

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1 A. I don't think I've ever posted a video

2 on YouTube.

3 Q. Do others post videos on your behalf?

4 A. I've never asked for a video to be

5 posted, if that's what you mean by "on my behalf."

6 Q. Are you aware that YouTube is the

7 second largest search engine in the world?

8 A. I don't know if I knew that off the top

9 of my head.

10 Q. Do you search for information on

11 YouTube?

12 A. I've probably searched for information

13 on YouTube.

14 Q. What kind of information?

15 A. I don't think I can recall off the top

16 of my head.

17 Q. Did you feel like you found what you

18 were searching for?

19 A. I don't recall without a specific

20 instance.

21 Q. When is the last time you searched for

22 something on YouTube?

23 A. Maybe within the past few weeks.

24 Q. And what did you search for?

25 A. I'm trying to recall what I searched

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1 for, which is why I'm stumbling here to find a

2 specific example. I don't recall exactly what I

3 searched for.

4 Q. When is the last time you watched a

5 video on YouTube, outside of the course of this

6 deposition?

7 A. Perhaps in the last week.

8 Q. What did you watch?

9 A. What did I watch? I don't recall what

10 I watched.

11 Q. And I say this very gently and not

12 critically. Do you find that you have any problems

13 with your memory at all?

14 A. I do not have any problems with my

15 memory.

16 Q. Are you aware that if you run a search

17 for "Eva Telzer" on YouTube, that there are many

18 videos on YouTube featuring you discussing your

19 research and work?

20 A. I'm aware that there are videos of

21 myself on YouTube.

22 Q. And we saw some of those videos

23 yesterday and today?

24 A. Yes.

25 Q. Do you know how many videos there are

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1 on YouTube of you discussing your research and

2 work?

3 A. I don't know how many.

4 Q. I stopped counting the number of

5 YouTube videos somewhere around ten or so. There

6 were more. You don't think that adolescents

7 watching your YouTube videos would suffer harm, do

8 you?

9 MS. COUCH: Object to the form.

10 THE WITNESS: I haven't considered

11 that.

12 BY MS. WADHWANI:

13 Q. Do you have a view as to whether, if an

14 adolescent sat down and watched your YouTube videos

15 today, they would suffer harm?

16 MS. COUCH: Asked and answered.

17 THE WITNESS: Given that the videos of

18 myself on YouTube are of me talking about the harms

19 of social media and how it is affecting their

20 developing brains, I think that they may learn

21 something about how social media is impacting them.

22 BY MS. WADHWANI:

23 Q. Do you think the watching of your

24 videos would cause those adolescents to suffer

25 harm?

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MS. COUCH: Asked and answered.

THE WITNESS: I think that if adolescents were viewing the videos of myself on YouTube, the videos in which I am talking about the research and the science, they would understand how social media is affecting their adolescent brain.

BY MS. WADHWANI:

Q. So is that a "no," you don't think an adolescent watching a YouTube -- your YouTube videos would suffer harm?

MS. COUCH: Objection. Vague.

THE WITNESS: That is indicating that in the specific instance of watching my videos, I think that they would learn about the role of social media on adolescent brain development.

BY MS. WADHWANI:

Q. Is it possible that an adolescent watching your YouTube videos would suffer harm?

MS. COUCH: Objection. Conjecture.

THE WITNESS: Based on the features and the way in which YouTube works and that the algorithms will likely feed them other potential content, that the video that they watch of me is not the only thing that they will be exposed to.

BY MS. WADHWANI:

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Q. Can you say that to a reasonable degree of certainty, sitting here today?

MS. COUCH: Objection. Conjecture.

THE WITNESS: Can I say what?

BY MS. WADHWANI:

Q. Your testimony that you just gave me.

A. Can I say what in -- what, specifically?

Q. Can you say that if an adolescent watched your YouTube videos, that the algorithm would give them content that they would be exposed to that could be harmful?

MS. COUCH: Objection. Conjecture.

Vague.

THE WITNESS: I believe that the features of YouTube would likely feed them other content that they may be exposed to, largely based on the algorithms that are shaping what they see.

BY MS. WADHWANI:

Q. Do you think that content would be harmful?

MS. COUCH: Objection. Vague.

THE WITNESS: I can't speculate on what other content they might see.

BY MS. WADHWANI:

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Q. What if teens watched all of your YouTube videos in one sitting, one after the other? Would that be harmful to them?

MS. COUCH: Objection. Conjecture.

THE WITNESS: My answer is no different for watching all than watching one. By watching the videos of me, likely all of them are this similar talk that I've given on the role of social media. They would learn about how it is affecting adolescent brain development.

BY MS. WADHWANI:

Q. And I understand that you think that they would learn something. Would they also be harmed?

MS. COUCH: Objection. Conjecture.

THE WITNESS: I can't -- I have not considered that.

BY MS. WADHWANI:

Q. So you think it's possible that a teenager watching all your YouTube videos in one sitting could suffer harm?

MS. COUCH: Asked and answered.

THE WITNESS: I have not considered that.

BY MS. WADHWANI:

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Q. If a teenager watched all your YouTube videos in one sitting, would that lead to brain changes in that teenager?

A. I have not considered that.

Q. You don't have a view on that right now?

A. I have not considered that.

Q. Do you think that teenagers watching three or more of your YouTube videos without pausing would cause them to develop an addiction to YouTube?

MS. COUCH: Objection. Conjecture.

THE WITNESS: I have not considered that.

BY MS. WADHWANI:

Q. So you don't know, you're telling me, if watching your YouTube videos on YouTube would cause a teenager to suffer harm or addiction or brain changes, right?

MS. COUCH: Asked and answered.

THE WITNESS: I have not considered that.

BY MS. WADHWANI:

Q. And because you don't know that, how is it that you allow your videos to stay on YouTube

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1 with the risk that they could cause harm to them?

2 MS. COUCH: Objection. Argumentative.  
3 Conjecture.

4 THE WITNESS: I have not allowed the  
5 videos to stay on or be posted. The videos are  
6 posted there.

7 BY MS. WADHWANI:

8 Q. Have you requested to the authors that  
9 they pull down those videos?

10 A. I have not.

11 Q. Why is that?

12 A. I have not considered pulling them  
13 down, nor did I consider posting them up.

14 Q. Do you think you might go after this  
15 deposition and ask for your videos to be pulled  
16 down because of a potential risk of harm to  
17 teenagers from your YouTube videos?

18 MS. COUCH: Objection. Conjecture.

19 THE WITNESS: I don't think I can  
20 speculate about the future.

21 BY MS. WADHWANI:

22 Q. You can't speculate about what you  
23 might do when you go home today?

24 A. I can't.

25 MS. COUCH: Objection. Conjecture.

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1 Argumentative.

2 BY MS. WADHWANI:

3 Q. Do you think watching your YouTube  
4 videos would cause teens to develop depression?

5 MS. COUCH: Objection. Conjecture.

6 THE WITNESS: I think that the general  
7 research that I have conducted shows that social  
8 media is -- is causing depression, yes.

9 BY MS. WADHWANI:

10 Q. I asked, specifically, do you think a  
11 teen watching your YouTube videos would suffer  
12 depression?

13 A. Oh, sorry. I didn't hear that you said  
14 "your videos."

15 Q. That's okay.

16 A. Sorry. I cannot speculate on -- on  
17 that.

18 Q. Okay. So you can testify that you  
19 think watching YouTube can cause depression in a  
20 teenager, but you can't speculate on whether  
21 watching your YouTube videos can cause depression  
22 in a teenager; is that your testimony?

23 A. The opinions that I have are based on  
24 broad research on social media and the features of  
25 those social media platforms.

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1 The research that we do examines these  
2 across lots of adolescents. And that research  
3 tells us that the ways and features of social media  
4 use is resulting in harms like depression.

5 Q. Would watching three of your YouTube  
6 videos in a row on autoplay cause a teenager to  
7 develop depression?

8 MS. COUCH: Asked and answered.

9 THE WITNESS: I have not considered  
10 that.

11 BY MS. WADHWANI:

12 Q. Why haven't you considered that given  
13 your opinions on the alleged harms of YouTube?

14 MS. COUCH: Objection. Conjecture.

15 THE WITNESS: I can't speculate on that  
16 broad question.

17 BY MS. WADHWANI:

18 Q. You knew before you wrote your report  
19 that there were videos featuring you on YouTube,  
20 correct?

21 A. I knew that there were videos of myself  
22 on YouTube.

23 Q. And as you wrote your report describing  
24 the harms of YouTube's features, as you consider  
25 them to be, you didn't consider whether watching

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1 YouTube videos of you would be harmful?

2 MS. COUCH: Argumentative. Asked and  
3 answered.

4 THE WITNESS: I have not considered  
5 that.

6 BY MS. WADHWANI:

7 Q. Do you agree that YouTube arguably  
8 should not be considered social media?

9 A. I do not agree with that.

10 Q. Do you agree that YouTube is more  
11 indicative of traditional media?

12 MS. COUCH: Objection. Vague.

13 THE WITNESS: I -- I believe that  
14 YouTube, similar to all the other platforms we're  
15 discussing today, have similar features, like the  
16 algorithms, like the quantifiability of them, that  
17 make this platform just as much as the others a  
18 risky context for adolescents.

19 (TELZER EXHIBIT 27, Publication titled  
20 Social media are many things: Addressing the  
21 components and patterns of adolescent social media  
22 use, was marked for identification.)

23 BY MS. WADHWANI:

24 Q. I'm handing you what we have marked as  
25 Exhibit 27. Dr. Telzer, please feel free to take a

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1 look at that.

2 Have you seen this document before?

3 A. Yes.

4 Q. What is this document?

5 A. This is a publication.

6 Q. This is a publication that includes you

7 as an author, correct?

8 A. Correct.

9 Q. And the title of this publication is

10 "Social media are many things: Addressing the

11 components and patterns of adolescent media use,"

12 correct?

13 A. "Of adolescent social media use."

14 Q. Sorry. Thank you. I was -- my eyes

15 were ahead of me. Let me say that again.

16 This is an article titled "Social Media

17 are many things: Addressing the components and

18 patterns of adolescent social media use," right?

19 A. Correct.

20 Q. This was published online just last

21 month, in May 2025, correct?

22 A. Correct.

23 Q. Can you please turn to the second page.

24 And at the top, it says "Page 25."

25 Do you see that?

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1 A. Yes.

2 Q. You stand by this paper?

3 MS. COUCH: Objection. Vague.

4 THE WITNESS: I don't know what you

5 mean by "stand by."

6 BY MS. WADHWANI:

7 Q. Do you agree with the statements in

8 this paper that you authored?

9 A. I agree that the content of this

10 article is what we wrote and is accurate.

11 Q. Okay. In the second column on Page 25,

12 can you please focus your attention on the second

13 full paragraph?

14 A. Yes.

15 Q. Are you there?

16 A. Yes.

17 Q. Okay. And I'm looking in the middle of

18 that paragraph with the sentence that starts "In

19 practice."

20 Do you see that?

21 A. Sorry. It's -- what -- what am I

22 looking for?

23 Q. Sure. You're looking for --

24 A. Oh, yeah. Sorry.

25 Q. -- the sentence that starts "In

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1 practice."

2 A. Yes.

3 Q. Are you there?

4 A. Yes.

5 Q. In practice, many tools and experiences

6 that perhaps should be considered social media are

7 excluded --

8 A. Uh-huh.

9 Q. -- (e.g., social gaming) and many that

10 arguably should not be considered social media are

11 included (e.g., YouTube, which typically affords

12 solitary content consumption in the one-to-many

13 format indicative of traditional media).

14 A. I see that.

15 Q. That's what that article said, right?

16 A. That says that, yes.

17 Q. You state here that YouTube arguably

18 should not be considered social media, correct?

19 A. That's what that says there, yes.

20 Q. And that's because YouTube provides

21 solitary content consumption?

22 A. It says it typically -- it typically

23 affords solitary content consumption.

24 Q. And it also says because YouTube is in

25 the one-to-many format indicative of traditional

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1 media, correct?

2 A. It says that.

3 Q. Now, you didn't provide those

4 statements in your report, correct?

5 A. That statement is not necessarily in my

6 report, no.

7 Q. It's, in fact, not in your report,

8 right?

9 A. Well, I think that this paper is likely

10 in my materials considered.

11 Q. Right. But the statement itself that

12 YouTube is arguably not social media because it's

13 in a format indicative of traditional media, that

14 is not in your report, correct?

15 MS. COUCH: Asked and answered.

16 THE WITNESS: That sentence is not in

17 my report, but the overall paper is in my materials

18 considered.

19 BY MS. WADHWANI:

20 Q. What is your definition of "traditional

21 media"?

22 A. I believe that this referred to

23 traditional media in the form, likely, of

24 television.

25 Q. And you aren't offering opinions in

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1 this case that traditional media causes harms,  
2 correct?

3 A. I haven't considered that.

4 Q. It's not in your report, right?

5 A. I have not considered that in my  
6 report.

7 Q. So you're not offering that opinion in  
8 this case, correct?

9 A. I'm not. I have not considered  
10 traditional media.

11 Q. Can you please take out your report.

12 One second. I forgot my copy of the  
13 report.

14 And can you please turn to Page 135 of  
15 your report.

16 A. 135.

17 Q. And do you see under those graphs,  
18 Dr. Telzer, that you refer to a Common Sense Media  
19 report from 2023?

20 A. I see that.

21 Q. Okay. And if you turn in your report  
22 to Page 136, you see what's labeled "Figure 6" in  
23 the middle of Page 136.

24 Do you see that?

25 A. I see that, yes.

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1 Q. And why did you include this study in  
2 your report?

3 A. I need to look at it more carefully to  
4 be able to answer that, please.

5 Q. Well, let's take a look at the study.

6 (TELZER EXHIBIT 28, Document titled  
7 2023 Constant Companion: A Week in the Life of a  
8 Young Person's Smartphone Use, was marked for  
9 identification.)

10 BY MS. WADHWANI:

11 Q. Here you are, Dr. Telzer.

12 A. Oh. Thank you.

13 Q. You're welcome.

14 This is the study that is on Page 135  
15 and 136 of your report that we were just talking  
16 about, right?

17 A. Yes, I believe so.

18 Q. Do you consider this a reliable study?

19 A. I'm just looking back at their  
20 methodology and findings.

21 Q. I'll withdraw the question.

22 You cited the findings of this report  
23 in your study, correct?

24 A. I cited this in my report, yeah.

25 Q. Okay. So let's turn to Page 8 of

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1 Exhibit 28.

2 A. Uh-huh.

3 Q. And on Page 8 of Exhibit 28, there is  
4 Figure 6. Do you see that?

5 A. I see that.

6 Q. Is this the same Figure 6 excerpted in  
7 your report?

8 A. Yes. Well, let me see. Yes. There's  
9 a part of -- of that figure put in my report.

10 Q. Right. Your -- your report excerpted a  
11 part of --

12 A. Yes.

13 Q. -- the figure on Page 8 of Exhibit 28,  
14 right?

15 A. Yes.

16 Q. And Figure 6, in this report that we've  
17 marked as Exhibit 28, shows that, on average,  
18 tweens and teens use social media during school  
19 nights for less than ten minutes a night, correct?

20 A. That's the median duration, not the  
21 average.

22 Q. Okay. Fair enough. I'll restate the  
23 question.

24 Figure 6 shows that the median age --  
25 the median duration of use of different smartphone

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1 app categories during school nights is less than  
2 ten minutes a night, right?

3 A. Yes. This is showing the median  
4 duration of social media is -- unclear on exactly,  
5 but less than ten.

6 Q. Less than ten minutes?

7 A. Uh-huh.

8 Q. And then after reporting on the median  
9 social media use during school nights, Figure 6  
10 then turns to YouTube use, right?

11 A. Correct.

12 Q. And Figure 6 reports that the median  
13 use of YouTube during school nights by tweens and  
14 teens is less than ten minutes a night, correct?

15 A. Yes. The median there is also less  
16 than ten minutes.

17 Q. And by "median," that means some teens  
18 and tweens watch YouTube on school nights for  
19 longer than ten minutes and some watch YouTube for  
20 less than ten minutes, right?

21 A. Yeah. More specifically, the median is  
22 the value where 50 percent of the users are under  
23 and 50 percent of the users are higher.

24 Q. Okay. And if you focus your attention  
25 on the text accompanying this Figure 6 to the left,

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1 you'll see, in the middle of the second paragraph,  
2 there is a discussion of YouTube.

3 And the document says: YouTube  
4 appeared to be the longest-running app due to  
5 several participants running it overnight, likely  
6 with music or white noise playing.

7 Do you see that?

8 A. I see that.

9 Q. Do you have any reason to dispute that  
10 finding?

11 A. That's what it says here.

12 Q. Do you have any reason to dispute that  
13 that's what the authors of the study found?

14 A. That's what they wrote here.

15 Q. Do you think they're wrong?

16 A. This is what they wrote here.

17 Q. Do you have a problem with saying that  
18 you agree or disagree that their findings are  
19 accurate as they understand them?

20 MS. COUCH: Argumentative. Calls for  
21 speculation as to others' beliefs.

22 THE WITNESS: I am merely saying that  
23 that is the statement that they have in this  
24 article.

25 BY MS. WADHWANI:

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1 Q. And you have no reason to dispute it,  
2 do you?

3 A. This is the statement that they have in  
4 their article.

5 Q. Are you offering the opinion that  
6 adolescents engage in heavy use of YouTube?

7 A. I think I need to look through my  
8 report to --

9 Q. I'm asking as you sit here today.

10 A. And as I sit here today, I'm  
11 representing the opinions in the totality of my  
12 report. So I want to make sure to be accurate.

13 Q. Well, yesterday, I think you told us  
14 that you believe that there is heavy problematic  
15 use of social media platforms and YouTube, correct?

16 A. I have the opinion that social media is  
17 heavily used by adolescents.

18 Q. And you think that leads to harm?

19 A. I have the opinion that adolescents'  
20 social media use is associated with very dramatic  
21 changes in their brain development. Their social  
22 media use is associated and leads to mental health  
23 problems, like depression, anxiety and body image  
24 concerns.

25 Q. What in your opinion constitutes heavy

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1 problematic use of YouTube?

2 MS. COUCH: Asked and answered.

3 THE WITNESS: As I discuss in my  
4 report, I have the opinions that adolescents are  
5 engaging in heavy use of social media; that social  
6 media is used in very problematic ways; and that  
7 social media use is leading to changes in the  
8 developing brain and mental health, including  
9 depression.

10 BY MS. WADHWANI:

11 Q. Does that depend on the way YouTube is  
12 being used by an adolescent?

13 A. My opinions are based on many things,  
14 including specifically the features of social media  
15 and the features of all of the platforms, which  
16 share things like the algorithms and the  
17 quantifiability and the publicness of it, and all  
18 of the things that I detail on Page 99 as well as  
19 other places in my report.

20 Q. If an adolescent in one sitting watches  
21 the entire three-and-a-half-hour Taylor Swift Eras  
22 Tour concert on YouTube, would that be heavy use?

23 A. I have not considered that.

24 Q. Would that be problematic use?

25 A. I have not considered that.

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1 Q. Would that cause brain changes in a  
2 teenager, watching the Eras Tour on YouTube?

3 A. I have not considered that.

4 Q. Would a teenage girl watching the  
5 Eras Tour on YouTube suffer from negative body  
6 comparisons?

7 A. I have not considered that.

8 Q. So you can't say one way or the other?

9 A. My research is looking at, broadly, how  
10 these patterns are occurring in adolescents. We  
11 have studied hundreds of adolescents. I have  
12 talked to hundreds of adolescents. I've talked to  
13 parents.

14 And the totality of those  
15 conversations, as well as understanding the  
16 research and the underlying data, I can say that  
17 using social media is related to developmental  
18 changes in the brain and mental health in  
19 adolescents.

20 Q. And if a teenager used YouTube to watch  
21 the entire three-and-a-half-hour Taylor Swift Eras  
22 Tour concert, would that lead to brain changes in  
23 that teenager?

24 MS. COUCH: Asked and answered.

25 THE WITNESS: I have not --

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MS. COUCH: Incomplete hypothetical.

THE WITNESS: I have not considered that.

BY MS. WADHWANI:

Q. Well, I'm a little confused, Dr. Telzer, because you've told us several times, as you've just told me now, that you have talked to scores of teenagers and parents; you've read numerous articles; you've read internal documents; you have talked with colleagues; you have training and education. And yet, you're not able to tell me, sitting here today, on the basis of all of that, whether or not a teenager who watches the full Eras Tour concert on YouTube would experience brain changes.

MS. COUCH: Asked and answered. Incomplete hypothetical.

THE WITNESS: No, I cannot speculate on that hypothetical.

BY MS. WADHWANI:

Q. Well, where is the difference between your ability to answer that question and your opinion that teenagers suffer brain changes from watching YouTube?

A. That is a hypothetical. And my

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opinions are based on years of -- of education and research and talking to lots of adolescents in the field, and I'm not speculating about a hypothetical.

Q. Has any of the adolescents in the field told you that they suffered brain changes from watching the Eras Tour on YouTube?

A. No, that has not been said.

Q. Has any teenager told you that they suffered negative body comparisons from watching the Eras Tour on YouTube?

A. I have not had that conversation.

Q. How about any parent?

A. I have not had that specific conversation.

Q. Do you think that a teenager who watched the Taylor Swift Eras Tour movie on Disney+ would suffer brain changes?

MS. COUCH: Objection.

THE WITNESS: I have not considered that.

BY MS. WADHWANI:

Q. Do you know what safety features are available on YouTube for adolescents?

A. I'm aware of safety features.

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Q. Can you name some?

A. I don't think I can name one off the top of my head.

Q. Do you -- can you name how many safety features there are available on YouTube for adolescents?

A. I cannot give you a specific number, no, not off the top of my head.

Q. Do you know what parental controls YouTube offers to parents?

A. I know as a parent that I have tried to implement parental controls and could not figure it out myself.

Q. Do you know what parental controls YouTube offers to parents?

A. I know that internal documents show that there are safety features that are largely opt in and that many documents show that less than 1 percent of individuals are using those safety features.

Q. When you couldn't figure out the safety features, did you do anything to find information to figure that out?

A. I attempted to find lots of information, yes.

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Q. Did you go to any of the information available on YouTube?

A. I -- I did.

Q. Did you go in a blog post?

A. I can't recall.

Q. Did you go to the help center?

A. I can't recall.

Q. Did you do any Google searches?

A. Probably, but I can't recall specifically.

Q. Do you know what kinds of supervised experience YouTube offers to allow parents to monitor and supervise their children or adolescents' use of YouTube?

A. I can't recall off the top of my head.

Q. Why was it that you wanted to use the parental control features on YouTube?

A. Because I have a young child who I was going to set up YouTube Kids for and wanted to look into making it protected for him.

Q. Okay. Do you know what safety features YouTube Kids offers?

A. I can't recall off the top of my head.

Q. What's your understanding of the difference between YouTube Kids and YouTube main?

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1 A. My understanding originally was that  
2 this was a platform designed or suggested to be  
3 designed to be safe for kids.

4 After seeing the internal documents, I  
5 now know that it is not safe for kids. And I have  
6 since immediately deleted it from my child's access  
7 and will not allow him to use it.

8 Q. And what documents are you referring  
9 to?

10 A. I can't specify a specific document.  
11 But I reviewed a lot of internal documents  
12 identifying many harms of YouTube Kids, including a  
13 lot of the features that are optimized to increase  
14 engagement and other things that I do not think are  
15 safe for a child.

16 Q. Did those internal documents say that  
17 YouTube Kids is harmful to children, or was that  
18 just your interpretation?

19 A. I saw lots of internal documents. I  
20 can't recall a specific one. I saw documents from  
21 YouTube broadly identifying that their platform is  
22 used in very problematic ways.

23 Q. Can you give me an example?

24 A. I reviewed lots of documents. I can't  
25 give you a specific one.

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1 Q. Can you give me an example of the  
2 alleged harmful ways that YouTube Kids those  
3 features work?

4 A. The algorithms and ways in which the  
5 platform is designed to increase engagement is not  
6 a way of creating a platform that is safe for a  
7 child.

8 Q. Do you know with certainty, sitting  
9 here today, that YouTube designed its platform  
10 YouTube Kids to maximize engagement of children?

11 A. I recall seeing documents indicating  
12 that there are features of the platform that are  
13 designed in order to maximize engagement.

14 Q. Which features?

15 A. Different features, including -- let me  
16 refer -- let me try to refer to my report, please.

17 Q. I don't believe your report refers to  
18 YouTube Kids, Dr. Telzer.

19 A. It refers to the features that I'm  
20 trying to talk about.

21 Q. Right. But I don't think it refers  
22 specifically to YouTube Kids. And that's what I'm  
23 asking you about.

24 Did you refer to YouTube Kids in your  
25 report?

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1 A. I did not specifically refer to  
2 YouTube Kids in my report but relied on the  
3 materials that I considered in my materials  
4 considered list.

5 Q. Okay. And I'm focused on YouTube Kids  
6 at the moment because that's what you just  
7 testified to.

8 Do you know how YouTube developed its  
9 safety features and controls?

10 A. I don't think I can speak to how it did  
11 that, no.

12 Q. Do you know what information YouTube  
13 relied on in developing its features and controls?

14 A. I can't speak to that.

15 Q. Do you know with whom YouTube  
16 consulted?

17 A. I can't speak to that.

18 Q. Have you ever studied the impact on  
19 adolescents of content on platforms in volume?

20 MS. COUCH: Objection. Asked and  
21 answered.

22 THE WITNESS: Have I ever studied  
23 for -- say that again, please.

24 BY MS. WADHWANI:

25 Q. Have you ever studied the impact of

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1 content on platforms in volume?

2 MS. COUCH: Objection. Vague.

3 THE WITNESS: "In volume"? What do you  
4 mean?

5 BY MS. WADHWANI:

6 Q. Meaning "several." We'll use YouTube.  
7 Several videos in a row.

8 A. Can you say that again? I'm not  
9 understanding your question.

10 Q. Sure. Have you ever studied -- you --  
11 you testified yesterday that your research has been  
12 content agnostic, correct?

13 A. I take a very content-agnostic  
14 perspective on the research that we're doing.

15 Q. And -- and so because of that, my  
16 question -- which I think I know based on the fact  
17 that you've said that your research is content  
18 agnostic, but I just want to know for the record.

19 Have you ever studied the impact of  
20 contact -- content in volume --

21 MS. COUCH: Objection.

22 BY MS. WADHWANI:

23 Q. -- on adolescents in YouTube?

24 A. I don't believe I've considered that.

25 Q. Do you know whether students use

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1 YouTube during school hours?

2 A. I need to refer to my report where I  
3 think I discuss that.

4 Q. Off the top of your head, do you know?

5 A. Not off the top of my head.

6 Q. Do you know whether students use  
7 YouTube for educational purposes during school  
8 hours?

9 A. Not off the top of my head.

10 Q. Are you aware that recent data from an  
11 IPSOS study found that 94 percent of teachers  
12 globally have used YouTube in their role as a  
13 teacher?

14 MS. COUCH: Objection. Assumes facts  
15 not in evidence.

16 THE WITNESS: I don't recall that  
17 specific statistic.

18 BY MS. WADHWANI:

19 Q. Do you think those teachers are harming  
20 their pupils?

21 MS. COUCH: Objection. Calls for  
22 speculation.

23 THE WITNESS: I have not considered  
24 that.

25 BY MS. WADHWANI:

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1 Q. Now, earlier today, Dr. Telzer, you  
2 said that the iMessage feature was not relevant to  
3 your opinions here.

4 Do you recall that?

5 MS. COUCH: Objection. Misstates her  
6 testimony.

7 THE WITNESS: I have not considered the  
8 iMessage in my -- in my opinions here.

9 BY MS. WADHWANI:

10 Q. Can you please go to Page 122 of your  
11 report.

12 Are you there, Dr. Telzer?

13 A. I am.

14 Q. Do you see that you note on this page  
15 that students in your research study generally went  
16 to one of at least 36 apps when they check their  
17 phones at school?

18 A. Sorry. You're on Page 122?

19 Q. 122, yeah.

20 A. Can you direct me where on this page,  
21 perhaps?

22 Q. Yes, I can. Oh. I'm in the wrong...

23 That information about going to one of  
24 36 apps is actually on 121 under "Objectively  
25 collected social media use."

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1 Do you see that?

2 A. Can you direct me where on the page,  
3 please?

4 Q. It's all right. We can -- that point's  
5 not important -- important.

6 Let me just focus you on the fact on  
7 Page 122. Do you see "Daily pickups"? That  
8 section?

9 A. I do.

10 Q. Do you see that you note here: The  
11 second top app used was the default Messages app?

12 A. Yes.

13 Q. Do you see that? And that's basically  
14 Apple's own texting app that comes on an iPhone,  
15 right?

16 A. Yes.

17 Q. And children and teens can use that to  
18 socialize with one another, correct?

19 A. Sure.

20 Q. It can send messages to one another?

21 A. Sure.

22 Q. They can participate in group chats?

23 A. Sure.

24 Q. They can share photos and selfies?

25 A. Sure.

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1 Q. They can share videos made by  
2 themselves or others?

3 A. Yes.

4 Q. Is the Messages app social media?

5 A. The Messages app does not have the  
6 features of social media that make it risky and  
7 unsafe for adolescents.

8 Q. Is the Messages app harming  
9 adolescents?

10 A. I have not considered that.

11 Q. Is the Messages app causing adolescents  
12 to compulsively check their phones during school  
13 hours?

14 MS. COUCH: Objection. Conjecture.

15 THE WITNESS: I have not considered  
16 that.

17 BY MS. WADHWANI:

18 Q. Yet you noted that it was the second  
19 top app used during school hours in your data. And  
20 you didn't consider that?

21 MS. COUCH: Objection. Misstates the  
22 report.

23 THE WITNESS: I'd have to read the  
24 full, thorough piece here to be able to comment.

25 BY MS. WADHWANI:

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Q. You mentioned yesterday that you've looked at parts of some of the internal documents produced by defendants in this case and all of other documents.

For YouTube, did you look at every document in full that you listed on your reliance list?

A. I looked at every document that I listed.

Q. Did you look at every page of every document?

A. I pulled up and at least looked at every document.

Q. Did you look at every page?

A. I skimmed through and looked at every document.

Q. My question is "every page," Dr. Telzer. I don't know how to ask that any more specifically or precisely. I'm talking about pages as opposed to documents.

Did you look at every single page of every single YouTube document that you cited?

A. I can't recall if I looked at every single page.

Q. How about the deposition testimony of

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the Google and YouTube employees? Did you read every page of those transcripts?

A. I looked at and skimmed, at least, every single document.

Q. How did you draw lines as to what documents to read every page of and what documents to skim?

A. I looked broadly through the documents. And those that were on topics most relevant to the topic of my report, ranging from problematic social media use to changes in adolescent brain development to school-related and sleep-related disruptions -- if those kinds of topics were represented, those, I spent more time reading.

MS. WADHWANI: Thank you.

I'm going to take a break here.

THE VIDEOGRAPHER: Going off the record. The time is 1:24 p.m.

\* \* \*

(Whereupon, there was a recess in the proceedings from 1:24 p.m. to 1:35 p.m.)

\* \* \*

THE VIDEOGRAPHER: Going back on the record. The time is 1:35 p.m.

\* \* \*

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## EXAMINATION

BY MR. CHERNACK:

Q. Good afternoon, Dr. Telzer. My name is Greg Chernack. We kind of met over the last day or so. I represent TikTok in this litigation. I'm last, perhaps least, but I have some questions for you.

First, do you have a TikTok account?

A. I do.

Q. When did you set up a TikTok account?

A. I don't recall. Many years ago, though.

Q. How often do you use TikTok?

A. I used TikTok -- I downloaded TikTok and used it for about an hour, got sucked into the platform, and immediately deleted it.

Q. Suffer from any withdrawal effects after deleting it?

A. I used it that one time.

Q. But you were able to stop?

A. I was able to stop.

Q. You just deleted it and it's still deleted?

A. It is still deleted.

Q. All right. Have you looked at anything

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on TikTok since you've deleted it?

A. I believe in the past couple weeks I redownload -- or I downloaded it onto my iPad to explore the features of it.

Q. Any specific features you mention in your report?

A. I was just doing a quick look at the interface is what I meant.

Q. So you don't -- you don't discuss any specific features in your report?

A. I discuss lots of features in my report that apply to all of the platforms, including TikTok.

Q. Fair enough. Any specific TikTok features that you discuss in your report that are unique to TikTok as compared to the other platforms?

A. I believe that all of the features that I discuss in my report generalize to all of the platforms, including TikTok.

Q. Okay. From the times you viewed any TikTok videos, any adverse effects on your mental health?

A. I did not enjoy being sucked into the platform and spending more time on it than I

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1 intended to.

2 Q. Would you say a lack of enjoyment is an  
3 injury to someone's mental health?

4 MS. COUCH: Objection. Vague. Calls  
5 for legal reasoning.

6 THE WITNESS: I would say that spending  
7 too much time than I intended was not a good  
8 outcome.

9 BY MR. CHERNACK:

10 Q. There are many things people spend more  
11 time on than they want to. Fair enough?

12 A. Fair enough.

13 Q. Watching TV?

14 A. Perhaps.

15 Q. Reading certain things?

16 A. I -- I don't know what --

17 Q. But that's different than having an  
18 injury to one's mental health; would you agree with  
19 that?

20 MS. COUCH: Objection. Vague. Calls  
21 for legal reasoning.

22 THE WITNESS: Spending more time on  
23 something than one intended is one aspect of  
24 something being problematic.

25 BY MR. CHERNACK:

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1 Q. But it -- it doesn't establish that  
2 something is problematic, correct?

3 A. It is one component of problematic use.

4 Q. Okay. So you could say it's necessary  
5 but not sufficient to say there's problematic use  
6 if you use it for longer than intended?

7 MS. COUCH: Objection. Vague.

8 THE WITNESS: Using a platform for  
9 longer than you intended is one feature of  
10 problematic use, one aspect of problematic use.

11 BY MR. CHERNACK:

12 Q. So, in itself, that -- that could be a  
13 sign of problematic use?

14 A. Spending more time on a platform than  
15 one intended is one component of problematic use.

16 Q. And would that apply to anything that  
17 one spends more time on than one intended?

18 MS. COUCH: Objection. Vague.

19 THE WITNESS: That's too speculative to  
20 comment on.

21 BY MR. CHERNACK:

22 Q. Okay. But, again, saying something is  
23 problematic use is not the same as saying someone's  
24 mental health was harmed; would you agree with  
25 that?

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1 MS. COUCH: Objection. Vague.

2 THE WITNESS: Problematic use is  
3 associated with things like mental health,  
4 including depression.

5 BY MR. CHERNACK:

6 Q. But they're different -- correct? --  
7 even if there is an association?

8 MS. COUCH: Objection. Vague.

9 THE WITNESS: Problematic social media  
10 use is associated with mental health, like  
11 depression.

12 BY MR. CHERNACK:

13 Q. Okay. As part of your academic work,  
14 do you typically review corporate documents?

15 A. I do not typically review corporate  
16 documents in my academic work.

17 Q. Have you ever in your academic work  
18 reviewed corporate documents?

19 A. Not that I can recall.

20 Q. Okay. Now -- and I know some of the  
21 other attorneys for the platforms have asked you  
22 some questions about the corporate documents of  
23 their specific platforms.

24 As I counted, I believe there's only  
25 six TikTok documents that are cited in your actual

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1 report. Does that sound right to you?

2 A. I don't recall the specific number, but  
3 there's probably six, sure.

4 Q. Okay. You don't have any reason to  
5 disagree with me. Fair?

6 A. I agree there's probably six, but there  
7 are many, many more in my materials considered  
8 list.

9 Q. I understand. But I'm just asking  
10 about the report right now, because those are the  
11 ones you picked out to cite in your report. Fair?

12 A. Those are the ones that I used as  
13 examples in my report.

14 Q. Okay. So let me start -- if you could  
15 go to Page 47 of your report, please.

16 And you -- you have a paragraph -- it's  
17 actually the first full paragraph on Page 47,  
18 starting: Defendants' documents provide further  
19 support.

20 Do you see that?

21 A. I see that.

22 Q. And say: provide further support that  
23 the public nature of social media use can lead to  
24 mental health challenges in teens.

25 And then you quote from a Meta document

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1 about "user research indicates unwanted photos...  
2 are a problem for teens -- and there are no real  
3 tools to deal with this."

4 Do you see that?

5 A. I see that.

6 Q. And you follow that with saying: Other  
7 defendants' documents contained similar findings.  
8 Correct?

9 A. Yes.

10 Q. And there's a footnote. And one of the  
11 documents cited in the footnote, the last one, is a  
12 TikTok document. Do you see that?

13 A. I see that.

14 (TELZER EXHIBIT 29, Document titled  
15 [MS Leads + Feature Policy] TTN Age Alignment,  
16 Bates TIKTOK3047MDL-036-LARK-00107642-49, was  
17 marked for identification.)

18 BY MR. CHERNACK:

19 Q. Okay. I'm going to hand you what I'm  
20 marking as Exhibit 29.

21 MR. CHERNACK: It's at Tab 5.

22 BY MR. CHERNACK:

23 Q. You don't need to worry about the tab  
24 numbers.

25 Have you seen this document before?

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1 A. I need a moment to look at it, please.  
2 Okay.

3 Q. And I apologize, because these do not  
4 have the Bates numbers on them for some reason. I  
5 don't know why that is.

6 MS. COUCH: Ours has the Bates.

7 MR. CHERNACK: Yours does?

8 MS. COUCH: Yeah.

9 MR. CHERNACK: Oh, even better.

10 MS. COUCH: Yeah. It's --

11 MR. CHERNACK: Oh, great.

12 MS. COUCH: -- one, two, three --

13 MR. CHERNACK: That makes my life  
14 easier. Not a problem.

15 MS. COUCH: It's --

16 BY MR. CHERNACK:

17 Q. So --

18 MS. COUCH: It's the sixth page, if you  
19 need it.

20 BY MR. CHERNACK:

21 Q. So the document is the same one,  
22 correct?

23 A. Yes.

24 Q. Okay. If you look at the top of the  
25 first page, do you see it says "TTN"?

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1 A. The very -- the title?

2 Q. Yes.

3 A. Yes.

4 Q. Do you know what "TTN" stands for?

5 A. I can't recall.

6 Q. Okay. If you go to the fifth page,  
7 which is the Bates number ending 647.

8 A. 64 -- okay.

9 Q. Do you see at the very top there's a  
10 reference to "TikTok Now"?

11 A. I see that.

12 Q. Any reason to disagree that "TTN"  
13 stands for "TikTok Now"?

14 A. I have no reason to disagree.

15 Q. Okay. Do you know anything about  
16 TikTok Now?

17 A. I'm not recalling the details.

18 Q. You don't know what -- what that  
19 feature was?

20 A. I don't recall.

21 Q. Any idea how long TikTok Now existed?

22 A. I couldn't tell you.

23 Q. Okay.

24 (TELZER EXHIBIT 30, Article titled  
25 TikTok is axing an in-app feature called TikTok Now

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1 that mirrored BeReal, was marked for  
2 identification.)

3 BY MR. CHERNACK:

4 Q. I'm going to hand you what I'm marking  
5 Exhibit 30, which is at Tab Number 12.

6 You see this is an article from the  
7 Associated Press? It says: TikTok is axing an  
8 in-app feature called TikTok Now that mirrored  
9 BeReal.

10 A. Yes.

11 Q. Okay. And do you see there's a date on  
12 the article, correct?

13 A. Yes.

14 Q. And that's June 27, 2023, correct?

15 A. Yes.

16 Q. And if you look at the article --  
17 excuse me -- second paragraph of the article, it  
18 says: This -- the feature, called TikTok Now, was  
19 just launched in September.

20 Do you see that?

21 A. Uh-huh.

22 Q. Yes?

23 A. Yes. Sorry.

24 Q. And so September would have been  
25 September 2022, correct?

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1 A. Was just --  
 2 (Reading to self.)  
 3 I --  
 4 MS. COUCH: Misstates the document.  
 5 THE WITNESS: I don't know if I could  
 6 say that on that.  
 7 BY MR. CHERNACK:  
 8 Q. Okay. If you want -- if you're going  
 9 to question that, I can show you something else.  
 10 But when it says -- I mean, this is an  
 11 article from June --  
 12 A. Yeah.  
 13 Q. -- and it says it was just launched in  
 14 September, you would think that means the prior  
 15 September, correct?  
 16 A. Sure.  
 17 Q. I mean --  
 18 A. I don't have reason to disagree with  
 19 that.  
 20 (TELZER EXHIBIT 31, Document titled  
 21 Introducing more ways to create and connect with  
 22 TikTok Now, was marked for identification.)  
 23 BY MR. CHERNACK:  
 24 Q. All right. But just so we're clear and  
 25 there's no question, I'm going to mark as

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1 Exhibit 31 another piece. Hand it to you. And  
 2 this is at Tab Number 11.  
 3 And this is a piece from TikTok called  
 4 "Introducing more ways to create and connect with  
 5 TikTok Now." Do you see that?  
 6 A. I see that.  
 7 Q. Okay. So this is an introduction. And  
 8 if you turn to the fourth page of this document,  
 9 this is dated September 15th, 2022, correct?  
 10 A. Sorry. You want me to go to Page --  
 11 Q. Yeah, right there, at the news.  
 12 A. Okay. Yes.  
 13 Q. Do you see the date?  
 14 A. I see that.  
 15 Q. And -- and if you go back to the first  
 16 page, it says that this -- if you go to the second  
 17 paragraph: TikTok Now is the newest way.  
 18 Do you see that?  
 19 A. I see that.  
 20 Q. So it's introducing TikTok Now in  
 21 September of 2022, correct?  
 22 A. Sure, I think --  
 23 Q. Okay. So any reason to disagree that  
 24 TikTok Now is a feature that existed for less than  
 25 a year?

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1 A. Meaning that from this document, we can  
 2 see that in June they're saying that they're  
 3 killing it off when it started in September, and  
 4 so, therefore, less than a year?  
 5 Q. Correct.  
 6 A. Yes.  
 7 Q. We're in agreement there, right?  
 8 A. Sure.  
 9 Q. So the quote you cited to about -- in  
 10 Footnote Number 2 is about a feature that lasted  
 11 for under a year, correct?  
 12 A. I -- I'm not putting all these pieces  
 13 together. So returning back to Number 29 now, I  
 14 think.  
 15 Q. Correct. Which is about TikTok Now,  
 16 which is what you've cited.  
 17 A. Yeah.  
 18 Q. And you have a quote. And the quote is  
 19 talking about a feature that lasted for less than a  
 20 year, correct?  
 21 A. Correct.  
 22 Q. Okay. You don't know why TikTok axed  
 23 that feature, correct?  
 24 A. I don't recall off the top of my head.  
 25 Q. Do you think you ever knew?

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1 A. I'm not sure if I knew that or saw  
 2 anything about that.  
 3 Q. Okay. You can put that aside.  
 4 If we can move forward to Page 49 of  
 5 your report, so two pages later. And you have --  
 6 excuse me.  
 7 You talk about constant accessibility,  
 8 correct?  
 9 A. At the end of that first paragraph? Is  
 10 that where you're referring to?  
 11 Q. Yes. I'm sorry.  
 12 A. I see that.  
 13 Q. Okay. And you go on at Footnote 6 to  
 14 cite a TikTok document talking about that this  
 15 finding is further supported by defendants' own  
 16 research.  
 17 Do you see that? The second --  
 18 A. The second paragraph?  
 19 Q. Yeah.  
 20 A. Yes, I see that.  
 21 Q. Then it says: For example, TikTok's  
 22 internal studies reported -- and then you have a  
 23 quote.  
 24 Do you see that?  
 25 A. I see that.

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(TELZER EXHIBIT 32, Document titled [TikTank] Wellbeing impacts - research report, Bates TIKTOK3047MDL-002-00100441-62, was marked for identification.)

MR. CHERNACK: Okay. And, if we could, I'm going to mark as Exhibit 32, and this is at Tab Number 1, a TikTok well-being impact research report.

BY MR. CHERNACK:

Q. Now, this is the document you cite in Footnote 6, correct?

A. Yes.

Q. Okay. And you have seen this document before, right?

A. Yes.

Q. And it's from March of 2020?

A. Yes.

Q. If we go to the second page, first of all, there's a number of bullet points.

Do you see that?

A. I do.

Q. All right. If we look at the first of those bullet points it says: Two of TikTok's main strengths from a well-being perspective are that it values authenticity rather than encouraging the

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"perfect" image and encourages active creation and engagement rather than passive use.

Do you see that?

A. I see that.

Q. You didn't mention that in your report, did you?

A. I did not.

Q. Okay. And then the next paragraph states: Our high proportion of younger users mean that we may need to talk more precautions than other platforms with older user bases. Correct?

A. I'm sorry. I'm just catching up.

Yeah.

Q. I read that correctly, didn't I?

A. Yeah.

Q. And you'd agree that was a good -- that's a good thing, correct?

MS. COUCH: Objection. Vague.

THE WITNESS: I don't know what your question is. Can you repeat it?

BY MR. CHERNACK:

Q. Sure. Do you agree that it's a good thing that TikTok is considering taking more precautions based upon having a high proportion of younger users?

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MS. COUCH: Objection. Vague.

THE WITNESS: Based on my readings of the larger documents, I know that these platforms identified young users as highly vulnerable. It looks like that is also the case here.

Indicating that they want to take precaution does not necessarily -- indicating that those precautions are being taken well.

BY MR. CHERNACK:

Q. Let me -- let me ask that question again.

Is it a good thing that a company is considering or is looking at taking precautions to protect their user base?

A. Broadly speaking, a company should take precautions.

Q. Okay. And, as we just looked at, there's a comment you made in your report on Page 49 about TikTok's internal studies.

Do you see that? We just looked at that.

A. Okay.

Q. I'm not going to read it again. I'm assuming it's in the record.

And if we could go to the page that

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ends with 445 on the Bates numbers.

A. Yep.

Q. And if you look at the bottom of the page. Do you see that? It's in slightly different colored font, starting in the paragraph with "We"?

A. I see that.

Q. Do you see that?

A. Yes.

Q. And after the "we found that strong," the rest of that is what you quote here: Longitudinal associations between very frequent social media use and mental health and well-being in girls -- and you added, actually, "and boys," right?

That's not in there, right? It just says "girls," correct?

A. Correct.

Q. So the brackets is just adding language. But it's not like you're adding language just rephrasing what was in the report. You've just added that, correct?

A. I mean, that was added. I don't recall. I'd have to look through more of this to see --

Q. But you --

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1 A. -- the context of that.

2 MS. COUCH: Misstates the document.

3 BY MR. CHERNACK:

4 Q. But you understand it's different.

5 Sometimes people use brackets just to

6 change a word to make clearer what the language is.

7 So, for example, it could say "she."

8 And the reader may not know who "she" is, so the

9 brackets will put a person's name in.

10 Do you understand what I'm saying?

11 MS. COUCH: Misstates the document.

12 Argumentative.

13 MR. CHERNACK: I'm not reading the

14 document. So I'm not sure how I can misstate it.

15 BY MR. CHERNACK:

16 Q. Dr. Telzer, what I'm saying is -- do

17 you understand how brackets work in writing?

18 A. I think that is inserting a -- a caveat

19 or addition to that sentence.

20 Q. But sometimes it's done -- say you were

21 quoting something that said: She went to school

22 today. Okay? But the reader doesn't know what

23 the -- who "she" is.

24 And you can put brackets in and put:

25 Dr. Telzer went to school today, so it's clear to

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1 the reader. But you haven't changed the meaning.

2 Do you understand that, what I'm

3 saying?

4 MS. COUCH: Objection. Vague.

5 THE WITNESS: I understand using

6 brackets in a sentence.

7 BY MR. CHERNACK:

8 Q. Okay. But here, by adding "and boys,"

9 that's not in the sentence. That's my point.

10 Correct? There's nothing about boys in

11 the sentence. You just added that, correct?

12 MS. COUCH: Objection. Misstates the

13 document.

14 THE WITNESS: I need to look into

15 more -- I need to read the document in full to see.

16 BY MR. CHERNACK:

17 Q. There's nothing in the document in full

18 or the word "and boys" in that sentence or anything

19 that can be interpreted in that particular sentence

20 to include boys.

21 MS. COUCH: Objection. Misstates the

22 document.

23 THE WITNESS: I am not sure I'm

24 following, and I would like to look through the

25 whole document in order to understand the context

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1 of being able to add "and boys" in there.

2 BY MR. CHERNACK:

3 Q. My question is much simpler. There's

4 nothing in the particular sentence you quoted in

5 your report where you added "and boys" in the

6 original sentence about boys, correct?

7 MS. COUCH: Argumentative. Asked and

8 answered.

9 THE WITNESS: That specific sentence on

10 that page does not have those words. I wanted to

11 look through the full document.

12 BY MR. CHERNACK:

13 Q. Okay. And then, if you go to the next

14 page of Exhibit Number 32, which you're looking at

15 right now, you can see that the language you quoted

16 from is from Viner, et al.

17 Do you see that?

18 A. I don't think I'm on the right page.

19 Can you --

20 Q. I think you -- it's page that ends in

21 4 -- 44 --

22 A. 446?

23 Q. -- 6.

24 A. Okay. I see now.

25 Q. Okay. So in your report, going back to

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1 your report, Page 49, you say: TikTok's internal

2 studies.

3 Do you see that?

4 A. I see that.

5 Q. And then you have a quote, correct?

6 A. Yep.

7 Q. Okay. But the quote is quoting not

8 TikTok but Viner, et al.

9 Do you see that?

10 A. I don't know if I understand the

11 question.

12 Q. Sure. Do you know who Viner is?

13 A. I don't recall.

14 Q. Oh. Do you know if Viner works for

15 TikTok?

16 A. I don't recall.

17 Q. Okay. You understand that the

18 quotation you took is actually a quote from

19 something that this document, Exhibit 32, is

20 quoting from a piece by Viner, et al.?

21 MS. COUCH: Objection. Argumentative.

22 THE WITNESS: I am quoting this

23 document. The document is quoted and referenced as

24 coming from this document.

25 BY MR. CHERNACK:

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1 Q. But the document itself is from  
 2 Viner -- the quote is from Viner, et al., right?  
 3 MS. COUCH: Asked and answered.  
 4 THE WITNESS: Sure. I need to read  
 5 this in -- in totality to understand the broader  
 6 context.  
 7 It appears that Viner, et al., that  
 8 this is being included in here, that this is being  
 9 quoted in this larger document.  
 10 BY MR. CHERNACK:  
 11 Q. Okay. So we can agree that the quote  
 12 is from Viner, et al., right?  
 13 MS. COUCH: Asked and answered.  
 14 THE WITNESS: Viner, et al. I think  
 15 that we can say that that quote comes from there.  
 16 It appears that there's a quote within this  
 17 document --  
 18 BY MR. CHERNACK:  
 19 Q. But you --  
 20 A. -- that I'm quoting.  
 21 Q. But in your report, you're saying  
 22 that's a TikTok internal study, correct?  
 23 A. I think TikTok's internal research is  
 24 reporting upon this study.  
 25 Q. But that's not a TikTok study, is it?

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1 MS. COUCH: Objection. Argumentative.  
 2 THE WITNESS: I'm not sure.  
 3 BY MR. CHERNACK:  
 4 Q. You -- you -- all right. At the  
 5 minimum, you don't even know if that's a TikTok  
 6 study, correct?  
 7 MS. COUCH: Asked and answered.  
 8 Argumentative.  
 9 THE WITNESS: I need to review this in  
 10 totality to be able to understand the context of  
 11 this better.  
 12 BY MR. CHERNACK:  
 13 Q. And then the piece after the quote from  
 14 Viner, et al., the TikTok piece discusses the Viner  
 15 study, correct? The following paragraph. Do you  
 16 see that?  
 17 A. I see that.  
 18 Q. And they said: Although the  
 19 researchers said the study was the best available  
 20 evidence of the effects of social media on  
 21 teenagers, it still had many limitations. For  
 22 example, the data showed how frequently the  
 23 subjects accessed or checked social media but not  
 24 how long they spent doing so.  
 25 Do you see that?

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1 A. I see that.  
 2 Q. And then: There's also a lack of  
 3 evidence to indicate a causal link between social  
 4 media use and bullying incidence or a deficiency of  
 5 sleep or physical activity, as explored in the  
 6 following sections. Correct?  
 7 A. I think I got lost.  
 8 Q. The two paragraphs after the --  
 9 A. I'm on the wrong page. "There's also a  
 10 lack of evidence" -- okay.  
 11 Q. Did I read that correctly?  
 12 A. "Indicate a causal link between social  
 13 media use and" --  
 14 (Reading to self.)  
 15 I missed the end of your statement as I  
 16 was looking for -- or the end of your reading of  
 17 the quote as I was looking for it in the document.  
 18 BY MR. CHERNACK:  
 19 Q. I'll reread the -- do you -- are we  
 20 okay on the first paragraph beginning with  
 21 "All [sic] the researchers" -- "although the  
 22 researchers"?  
 23 A. Yes.  
 24 Q. Okay. Then just the second paragraph:  
 25 There is also a lack of evidence to indicate a

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1 causal link between social media use and bullying  
 2 incidence or a deficiency of sleep or physical  
 3 activity, as explored in the following sections.  
 4 Did I read that correctly?  
 5 A. Yes.  
 6 Q. So TikTok's assessment was at least  
 7 discussing limitations of Viner, et al., correct?  
 8 MS. COUCH: Asked and answered.  
 9 THE WITNESS: Looks like they are going  
 10 to discuss that in the following sections.  
 11 BY MR. CHERNACK:  
 12 Q. And they point out some of it here and  
 13 then have more discussion later, correct?  
 14 A. Sure.  
 15 Q. But you don't discuss any of that in  
 16 your report, correct?  
 17 A. I refer to the document and rely upon  
 18 this as well as a host of other documents in my  
 19 materials considered list, not just the one quote  
 20 that you're pulling out.  
 21 Q. But you mischaracterized this document.  
 22 What you quoted is saying it's a TikTok study, when  
 23 it was not a TikTok study, right?  
 24 A. I didn't misquote. I described it as  
 25 internal studies. It's internal documents.

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1 Q. I didn't say you misquoted it. I said  
 2 you mischaracterized. You said it's an internal  
 3 study.  
 4 A. It's internal documents.  
 5 Q. It's not an internal study, correct?  
 6 A. This specific quote is not an internal  
 7 study.  
 8 Q. Okay. And then if we could go to the  
 9 page ending with Bates 449.  
 10 A. Uh-huh.  
 11 Q. This exhibit also discusses how  
 12 moderate use of screen time may have slight  
 13 well-being benefits. Do you see that?  
 14 A. Can you point at me to where you're --  
 15 Q. Yeah. It's --  
 16 A. -- seeing that? Sorry.  
 17 Q. It's -- it's the heading in the middle  
 18 of the page.  
 19 A. The "Moderate use"?  
 20 Q. Yes.  
 21 A. Yep.  
 22 Q. Did I read that correctly?  
 23 A. "Moderate use of screen time may have  
 24 slight well-being benefits." I see that.  
 25 Q. Do you know anything about the U.K.'s

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1 Online Harms White Paper that is referenced there?  
 2 A. I don't recall.  
 3 Q. And it notes: Most children have a  
 4 positive experience online.  
 5 Do you see that?  
 6 A. I see that.  
 7 Q. It goes on to say: using the Internet  
 8 for social networking, educational resources and  
 9 entertainment.  
 10 And then it adds: According to  
 11 nonacademic literature, potential benefits from  
 12 social media for young people include:  
 13 Self-expression: A study of 2,000 8-  
 14 to 17-year-olds in the U.K. in December 2019 found  
 15 that 38 percent find it easier to be themselves  
 16 online than offline, rising to 54 percent of  
 17 disabled young people feeling this way.  
 18 Enhancing relationships: 2018 research  
 19 report by Ofcom, showed that nine in ten social  
 20 media users aged 12 to 15 state that social media  
 21 use has made them feel happy or helped them feel  
 22 closer to their friends.  
 23 Do you see all that?  
 24 A. I see that.  
 25 Q. You didn't discuss any of that in your

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1 report, did you?  
 2 A. I did not discuss those specific bullet  
 3 points.  
 4 Q. Have you looked at any of those studies  
 5 that are cited here?  
 6 A. I don't recall.  
 7 Q. And sitting here today, you don't have  
 8 any criticisms of those studies. Is that fair?  
 9 A. I would have to look at them.  
 10 Q. So I'm correct that, sitting here  
 11 today, you don't have any criticisms of those  
 12 studies, correct?  
 13 MS. COUCH: Asked and answered.  
 14 THE WITNESS: I can't have a criticism  
 15 without an opportunity to look at them.  
 16 BY MR. CHERNACK:  
 17 Q. Okay. And you don't know if you've  
 18 ever looked at them. Is that fair?  
 19 A. I can't recall.  
 20 (TELZER EXHIBIT 33, Document titled  
 21 [P&C] Tiktok's Age Appropriate Design Guidance,  
 22 Bates TIKTOK3047MDL-006-00326148-95, was marked for  
 23 identification.)  
 24 BY MR. CHERNACK:  
 25 Q. Okay. Let's mark as Exhibit 33 another

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1 document you cite. This is P&C TikTok's Age  
 2 Appropriate Design Guidelines.  
 3 MR. CHERNACK: Did I say Tab 4? If I  
 4 didn't, it is.  
 5 BY MR. CHERNACK:  
 6 Q. And if we could start on the first page  
 7 of the "Overview" section. Do you see that?  
 8 A. Yes.  
 9 Q. Okay. And it says: We want young  
 10 people's use of TikTok to support healthy  
 11 development; and, therefore, we seek to anticipate  
 12 their evolving needs, capacities and  
 13 vulnerabilities in the design of our service.  
 14 We think carefully about what  
 15 additional support teens need to use TikTok safely  
 16 and design our platform accordingly. This means  
 17 teens experience TikTok differently to adults.  
 18 Do you see all that?  
 19 A. I see that.  
 20 Q. Did I read it correctly?  
 21 A. Yes.  
 22 Q. For the moment, focusing on the last  
 23 sentence, you agree that teens experience TikTok  
 24 differently to adults?  
 25 A. Do I agree that teens experience TikTok

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1 differently than adults?

2 Q. Yeah.

3 A. I know that adolescents' social media  
4 experiences are shaped by their vulnerabilities in  
5 their brains that make them experience social media  
6 in unique ways and make them especially vulnerable  
7 to social media.

8 I think we can then say that that means  
9 that teens are going to experience social media in  
10 different ways than adults.

11 Q. And, therefore, it's appropriate for a  
12 social media platform to limit certain features  
13 away for -- prevent certain features from being  
14 accessible to people under a certain age. Do you  
15 agree with that?

16 MS. COUCH: Objection. Vague.

17 THE WITNESS: It's hard to speculate so  
18 broadly, but social media platforms should be made  
19 safe for teens.

20 BY MR. CHERNACK:

21 Q. If you can go to the page ending in  
22 Bates Number 152. And this is a table, and it  
23 says -- if you see, there are three columns. Do  
24 you see that?

25 A. Uh-huh.

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1 Q. Yes?

2 A. Yes.

3 Q. The first one says "Setting" or  
4 "Feature." And then it's divided by early teens,  
5 which are ages 13 to 15, and late teens, 16 to 17.  
6 Do you see that?

7 A. I see that.

8 Q. So there are different settings for  
9 particular groups based on the age of the user,  
10 correct?

11 MS. COUCH: Objection. Vague.

12 THE WITNESS: It appears that's what  
13 that particular line is showing.

14 BY MR. CHERNACK:

15 Q. Okay. Now, if we could jump forward  
16 for a moment to the page ending in Bates Number  
17 181. Are you with me?

18 A. I'm on 181.

19 Q. Okay. If you look at the bottom, it  
20 says: Participating in a Live Match.

21 Do you see that?

22 A. "Participating in a Live Match," yes.

23 Q. Okay. And it says -- do you know what  
24 a live match is?

25 A. I don't think I recall what that means.

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1 Q. Okay. Let me mark as Exhibit 34 what's  
2 at Tab 10.

3 (TELZER EXHIBIT 34, Document titled  
4 Start a LIVE match to call on your supporters,  
5 Updated on Feb 11, 2025, was marked for  
6 identification.)

7 BY MR. CHERNACK:

8 Q. And if you look at the last paragraph  
9 on this page, it describes what a live match is,  
10 where it says: A live match is a feature that  
11 allows creators to engage in competitions with each  
12 other during a co-hosted live session.

13 Viewers support their favorite creators  
14 by sending gifts, with each coin representing one  
15 match point and each like representing three match  
16 points. The creator or team with the highest  
17 points at the end of the match wins. This not only  
18 enhances viewer engagement, but also boosts the  
19 creator's rewards.

20 Do you see that?

21 A. I see that.

22 Q. Okay. You can put that part aside.

23 And if -- if you look, first of all,  
24 the setting is "not available" for either early  
25 teens or late teens, correct?

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1 A. I see that.

2 Q. And there's also a comment, if you look  
3 to the right -- and I realize the writing is very  
4 small, which may be more of a problem for me than  
5 it is for you.

6 But it says in the last -- it's the  
7 bottom quote. It says: Putting 16- to  
8 17-year-olds in a position where they are required  
9 to compete for likes would not be well received,  
10 and I would advise against opening up Match for  
11 this reason.

12 Do you see that?

13 A. I see that.

14 Q. So what we can see here is both that  
15 it's not available and a comment from a TikTok  
16 employee encouraging that it stays that way,  
17 correct?

18 A. I see that.

19 Q. Okay. And even if -- now, you -- you  
20 had stated that you thought TikTok is trying to  
21 engage -- maximize teenage engagement, correct?

22 A. My review of documents indicate that  
23 the platforms and the algorithms in particular are  
24 used to maximize teenage engagement.

25 Q. But if TikTok thought that this could

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1 encourage user engagement but nonetheless wasn't  
2 making it available to teens, that would not be  
3 seeking to maximize engagement, would it?

4 MS. COUCH: Objection. Hypothetical.  
5 Calls for speculation.

6 THE WITNESS: I can't speculate on that  
7 hypothetical.

8 BY MR. CHERNACK:

9 Q. Okay. But at least you're seeing here  
10 there's a feature that is being restricted to a  
11 certain age group, correct?

12 A. I see there -- in this context, there's  
13 one feature that is saying that it is not  
14 available.

15 Q. Okay. We're focusing on one. Do you  
16 know if there are other features that TikTok  
17 precludes those that are under 18 from accessing?

18 A. I can't think off -- or I can't produce  
19 them off the top of my head, if there are any.

20 Q. But you aren't saying there aren't any,  
21 correct?

22 A. I can't recall.

23 Q. Okay. If we look at Page 50 of your  
24 report, you're talking about quantifiability in  
25 this section at the top of 50, correct?

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1 A. Yes.

2 Q. And the second paragraph talks about --  
3 starts with: All of the defendants' internal  
4 documents reflect this phenomenon. Correct?

5 A. Yes.

6 Q. And then, going down about four lines,  
7 you say: A similar phenomenon was observed with  
8 respect to likes, comments, and notifications.  
9 Correct?

10 A. Yes.

11 Q. And what you're citing from TikTok is  
12 the language we just looked at in that comment,  
13 correct? If you look in Footnote 8.

14 A. This is talking about the  
15 quantifiability.

16 Q. Right. But look at Footnote 8.

17 A. Yeah.

18 Q. And the language I quoted -- excuse me.  
19 The language you quoted is what I just  
20 read to you, correct?

21 A. That is correct.

22 Q. Okay. So what you quoted here is  
23 language encouraging TikTok not to change the  
24 settings to make a feature that it was already  
25 blocking to those under the age of 18, correct?

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1 A. I think it's acknowledging one example  
2 where they identify knowing that competing for  
3 likes would not be good.

4 Q. But the point is --

5 A. That the --

6 Q. I'm sorry. I didn't mean to cut you  
7 off.

8 A. Sorry. That the quantifiability in  
9 this like feature is likely not a good thing that  
10 they should do.

11 Q. But it's talking about competing for  
12 likes, correct?

13 A. That is one domain, I think, of the  
14 quantifiability here of the likes.

15 Q. But you're talking about a thing that  
16 TikTok wasn't doing because of the very concern  
17 you're expressing, correct?

18 MS. COUCH: Argumentative.

19 THE WITNESS: I think that they are  
20 discussing the quantifiability of likes; and,  
21 therefore, it's quoted there.

22 BY MR. CHERNACK:

23 Q. Okay. And then if we go to the page  
24 ending in 161 on the exhibit in front of you, which  
25 I believe is Number 33.

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1 And do you see on the left-hand column  
2 the feature now being looked at is: Allow others  
3 to download teens' videos?

4 Do you see that?

5 A. I see that.

6 Q. And looking at the early teens, the 13-  
7 to 15-year-olds, what does it say about that  
8 feature?

9 A. Sorry. I don't see how to identify the  
10 13 to 15.

11 Q. It's just one column to the right, as  
12 we saw back on the first page we looked at where it  
13 sets out the columns. That's back on the -- I  
14 think it's the fifth page of this document.

15 A. Oh, I see. Okay.

16 Q. What does it say about early teens in  
17 that feature?

18 A. Permanently disabled?

19 Q. Yes. Okay. And then about older  
20 teens?

21 A. Off by default with the option to  
22 change to on.

23 Q. Which is different from what you said  
24 about many features. This one is, at least at this  
25 time, is set to off, correct?

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1 A. I don't think I refer to features as --  
2 I don't think I've referred to allowing others to  
3 download teens' videos.

4 What I'm talking --

5 Q. I'm sorry. It was a bad question. I  
6 was talking more generally.

7 You were talking, I believe, with  
8 counsel for YouTube, and you made a comment that,  
9 basically, these safety features were set to off  
10 and you had to turn them on, correct? In many --  
11 in most cases, generally speaking?

12 A. I recall seeing a lot of documents  
13 where some safety features were opt-in --

14 Q. And -- and my --

15 A. -- rather than turn off.

16 Q. And I don't think your comment was  
17 focused on YouTube, and my question wasn't.

18 I just -- you made a general comment.  
19 And here you're seeing this is the opposite of  
20 that, correct?

21 A. In this case, there is an example of  
22 a -- a default with an opt-to-change-on option.

23 Q. Okay. And in discussing why it's  
24 permanently disabled for younger teens, the  
25 document states -- and correct me if I'm reading

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1 this incorrectly: Early teens are less likely to  
2 understand the long-term consequence of not being  
3 able to retain control of a video once it has been  
4 downloaded.

5 Do you see that?

6 A. I do.

7 Q. Any criticism of TikTok's decision to  
8 permanently disable that feature for 13- to  
9 15-year-olds?

10 A. I don't have a criticism of disabling  
11 that.

12 Q. Okay. In your experience as a  
13 professor and a researcher, when you publish a  
14 research study, are there common elements of it?

15 A. There's an abstract. There's an  
16 introduction. There's a methods. There's a  
17 discussion. There's references.

18 Q. Okay. Let's turn to Page 51, which  
19 I -- actually, counsel for Meta talked to you about  
20 this a little bit.

21 A. 51 of this --

22 Q. Of your report. I'm sorry.

23 A. Sorry. Okay.

24 Q. And if you look at the -- it's the  
25 paragraph before the asynchronicity section.

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1 A. Uh-huh.

2 Q. It talks about YouTube internal  
3 documents, about how a high volume of video -- that  
4 the high volume of videos that can repeat the same  
5 message. And you say there: Meta and ByteDance  
6 studies reflect similar conclusions as well.

7 Did I read that correctly?

8 A. Yes.

9 Q. Do you know what ByteDance is?

10 A. I don't think I recall what that means.

11 Q. Okay. Let me show you what's at Tab 3.

12 MR. CHERNACK: I'm going to mark it as  
13 Exhibit 35.

14 (TELZER EXHIBIT 35, Document titled  
15 Rabbit Holes --> No doubt about it; it will happen,  
16 Bates TIKTOK3047MDL-004-00144763-64, was marked for  
17 identification.)

18 BY MR. CHERNACK:

19 Q. Am I correct this is the document you  
20 cite --

21 A. Yes.

22 Q. -- in your report?

23 A. Yes.

24 Q. Is there an abstract?

25 A. To what?

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1 Q. To Exhibit 35?

2 A. There's not an abstract.

3 Q. Introduction?

4 A. There's not an introduction.

5 Q. Description of methodology?

6 A. There's not a description of the  
7 methodology.

8 Q. A literature review?

9 A. I mean, this is just a list of bullet  
10 points.

11 Q. Okay. You describe it as a study in  
12 your report, don't you?

13 A. I think I give an example of one  
14 document that helps us to reflect upon this broader  
15 conclusion.

16 Q. If you have a statement in something  
17 you wrote and dropped a footnote to something that  
18 was totally different, would that be proper?

19 MS. COUCH: Argumentative.

20 THE WITNESS: I gave an example of one  
21 among many documents that I reviewed --

22 BY MR. CHERNACK:

23 Q. But this --

24 A. -- amongst here.

25 Q. -- this sentence says: Meta and

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1 ByteDance studies reflect similar conclusions as  
2 well.  
3 And what you cite is not a study,  
4 correct?  
5 MS. COUCH: Argumentative.  
6 THE WITNESS: I provide one footnote to  
7 a document amongst many other documents that I  
8 reviewed that do provide that and that are in my  
9 materials considered list.  
10 BY MR. CHERNACK:  
11 Q. You did not cite a ByteDance study in  
12 Footnote 10, did you?  
13 MS. COUCH: Asked and answered.  
14 THE WITNESS: I reference one example  
15 here amongst many that I considered and reviewed in  
16 the materials considered list.  
17 BY MR. CHERNACK:  
18 Q. You're not answering my question,  
19 Doctor.  
20 First of all, you agree Exhibit 35 is  
21 not a study, correct?  
22 A. I need to review this, but it looks  
23 like a list of bullet points.  
24 Q. It's a page and -- not even a page and  
25 a half. Is this a study?

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1 A. This looks like a list of bullet  
2 points.  
3 Q. So that's not a study, correct?  
4 A. It does not look like a study.  
5 Q. All right. Is there any mention of  
6 ByteDance?  
7 A. Not in this document.  
8 Q. Okay. All right. You -- you can put  
9 that aside.  
10 Am I correct you wrote your report  
11 yourself?  
12 A. I wrote my report.  
13 Q. Okay. I just have one last question,  
14 and maybe I'm missing something.  
15 If you go to Page 7, the last  
16 paragraph.  
17 You say you received your undergrad  
18 degree in psychology at Mount Holyoke in 2004,  
19 correct?  
20 A. Uh-huh.  
21 Q. And it says: where I graduated  
22 magna cum laude with highest honors. Is that  
23 correct?  
24 A. That's correct.  
25 Q. So "magna cum laude" means "highest

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1 honors"?  
2 A. I graduated with two honors magna cum  
3 laude as well as highest honors in my psychology  
4 degree.  
5 Q. Okay. I just wanted to make sure that  
6 was clear. Is that on your CV, though, in --  
7 online saying that?  
8 A. I'm not sure, but I'm happy to look at  
9 it.  
10 Q. All right. I just wanted to make sure  
11 it was clear, and I just -- if that's the case,  
12 that's fine. I'm just -- want to make sure I was  
13 right.  
14 MR. CHERNACK: All right. I don't have  
15 anything else right now. Thank you very much for  
16 your time.  
17 THE WITNESS: Okay. Thank you.  
18 MS. COUCH: Are the defendants done?  
19 You guys have five minutes. I mean, I'm not  
20 encouraging it, but this is the moment. I don't  
21 want anyone to say that they were rushed.  
22 MS. JONES: Well --  
23 MS. COUCH: I'm being silly, Phyllis.  
24 Let's not respond.  
25 MS. EHLE: There's probably not --

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1 there's probably not anything we can --  
2 MS. JONES: We can go off the record.  
3 MS. EHLE: -- effectively use those  
4 five minutes for right now, so --  
5 THE REPORTER: Are we going off the  
6 record?  
7 MR. CHERNACK: Yes.  
8 THE VIDEOGRAPHER: Going off the  
9 record. The time is 2:21 p.m.  
10 \* \* \*  
11 (Whereupon, there was a recess in the  
12 proceedings from 2:21 p.m. to 2:50 p.m.)  
13 \* \* \*  
14 THE VIDEOGRAPHER: Going back on the  
15 record. The time is 2:50 p.m.  
16 MR. CHERNACK: Can we confirm we have  
17 agreement that if I object, that it will be an  
18 objection for all defendants and we do not have to  
19 each one separately object?  
20 MS. COUCH: Confirmed.  
21 MR. CHERNACK: Thank you.  
22 \* \* \*  
23 EXAMINATION  
24 BY MS. COUCH:  
25 Q. Dr. Telzer, as a scientist, would it be

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1 widely accepted in your field to cherry-pick  
2 singular sentences from a handful of studies to  
3 reach a conclusion?

4 A. No.

5 Q. And did you rely upon your review of  
6 over 1500 studies, your education, fieldwork,  
7 defendant documents to support your opinions as  
8 stated in your report?

9 A. Yes.

10 Q. Did your report and opinions  
11 incorporate all of these studies, including the  
12 limitations, data and methods as stated in your  
13 report?

14 A. Yes.

15 MR. CHERNACK: Objection.  
16 Mischaracterizes the record.

17 BY MS. COUCH:

18 Q. In forming your opinions, did you  
19 consider the benefits of social media?

20 A. Yes.

21 Q. And have you previously published on  
22 the benefits of social media?

23 A. Yes.

24 Q. And in reviewing all of the materials  
25 considered, is it still your opinion as stated on

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1 Page 65 of your report that the perceived  
2 short-term benefits are likely outweighed by the  
3 risk of long-term negative outcomes?

4 A. Yes.

5 Q. And yesterday and today, do you recall  
6 being shown various clips and slides from  
7 interviews and presentations that you have given?

8 A. Yes.

9 (TELZER EXHIBIT 36, Video - Slides for  
10 presentation with Eva Telzer and Mitch Prinstein -  
11 Digital Minds: Brain Development in the Age of  
12 Technology, was marked for identification.)

13 (TELZER EXHIBIT 37, Digital Minds:  
14 Brain Development in the Age of Technology Rough  
15 Transcript, was marked for identification.)

16 (TELZER EXHIBIT 38,  
17 #Technology#SocialMedia#AdolescentMentalHealth/  
18 Webinar with Dr. Mitch Prinstein and Dr. Eva  
19 Telzer, 5/31/23 Rough Transcript, was marked for  
20 identification.)

21 (TELZER EXHIBIT 39, Interview with  
22 Eva Telzer and Mitch Prinstein at the BrainMind  
23 Summit Rough Transcript, was marked for  
24 identification.)

25 BY MS. COUCH:

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1 Q. And I'm going to put in front of you  
2 what I have marked as Exhibits 36, 37, 38 and 39.

3 And in looking at these exhibits, do  
4 these appear to be the true and accurate copies of  
5 your interview and slides as previously reviewed?

6 A. Yes.

7 MS. COUCH: That's all my questions.

8 MR. CHERNACK: We're going to need a  
9 moment to discuss.

10 THE VIDEOGRAPHER: All right. Going  
11 off the record. The time is 2:52 p.m.

12 \* \* \*

13 (Whereupon, there was a recess in the  
14 proceedings from 2:52 p.m. to 2:59 p.m.)

15 \* \* \*

16 THE VIDEOGRAPHER: Going back on the  
17 record. The time is 2:59 p.m.

18 \* \* \*

19 EXAMINATION

20 BY MR. CHERNACK:

21 Q. I just have a few quick questions.

22 Talking about Exhibits 36 to 39, is  
23 there anything in any of those four exhibits that  
24 you were just handed by plaintiffs' counsel that  
25 adolescents should stay off social media entirely?

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1 MS. COUCH: Objection. Compound.

2 THE WITNESS: I can review in detail if  
3 you like, but I don't think that these documents  
4 indicated to stay off entirely. They cite to limit  
5 that -- limit social media use.

6 BY MR. CHERNACK:

7 Q. Is there anything in Exhibits 36 to 39  
8 stating that it's been established that social  
9 media use in adolescents causes any mental health  
10 condition?

11 MS. COUCH: Objection. Compound.

12 THE WITNESS: I would have to review  
13 every sentence of that in order to indicate whether  
14 that is said in any of these documents.

15 BY MR. CHERNACK:

16 Q. You can't identify right now any such  
17 statement, can you?

18 A. I cannot.

19 Q. Is there any statement in Exhibits 36  
20 to 39 about any conflict of interest you have based  
21 upon your work for plaintiffs in this litigation?

22 MS. COUCH: Objection. Compound.

23 THE WITNESS: I don't believe so.

24 BY MR. CHERNACK:

25 Q. And then you -- you were asked a

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1 question about -- talking about in your report that  
2 you evaluated the benefits of social media. What  
3 methodology did you use to evaluate those benefits?

4 A. I've done broad literature review of  
5 published articles. I have also published articles  
6 on it myself. I have looked at that broad  
7 literature to understand the benefits.

8 Q. But other than --

9 MS. COUCH: I think we're done. No.  
10 We're done. Time is up.

11 MR. CHERNACK: Well, that's debatable.  
12 Then we still have five minutes left from before.

13 MS. COUCH: That was not our agreement.  
14 Our agreement was redirect would be limited to my  
15 redirect. We went a minute and 42 seconds, so I  
16 actually allowed extra time to finish.

17 MR. CHERNACK: Well, I just will note  
18 that we reserve our rights on the record to reopen  
19 this based upon additional documents we believe we  
20 had asked for previously and that we're entitled  
21 to.

22 But other than that, thank you very  
23 much for your time, Dr. Telzer. I know it's been a  
24 long two days. And I think we're done.

25 MS. COUCH: And I would just note for

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1 the record, our objections are noted, and the  
2 response and objections to the deposition notice.

3 And other than that, I'm good to go off  
4 the record.

5 THE VIDEOGRAPHER: Before we go off the  
6 record, the total time for today is: Meta had  
7 1 hour and 41 minutes. Snap, 43 minutes. YouTube,  
8 39 minutes. TikTok, 48 minutes. And plaintiffs  
9 had 2 minutes.

10 That ends this deposition. The time is  
11 3:01 p.m.

12 (WHEREUPON, the deposition was  
13 concluded at 3:01 p.m.)

14 (The witness reserves the right to read  
15 and sign this transcript.)

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# DEPOSITION ERRATA SHEET

1 Our Assignment No: 7396484  
2  
3 Case Caption: Social Media Adolescent Addiction  
4  
5 (JCCP No. 5255)

## DECLARATION UNDER PENALTY OF PERJURY

6 I declare under penalty of perjury that I  
7 have read the entire transcript of my Deposition  
8 taken in the captioned matter or the same has been  
9 read to me, and the same is true and accurate, save  
10 and except for changes and/or corrections, if any,  
11 as indicated by me on the DEPOSITION ERRATA SHEET  
12 hereof, with the understanding that I offer these  
13 changes as if still under oath.

14 Sign on the \_\_\_\_\_ day of  
15 \_\_\_\_\_, 20 \_\_\_\_.

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## CERTIFICATE OF REPORTER

I, Cindy A. Hayden, Registered Merit Reporter and Notary Public for the State of North Carolina at Large, do hereby certify that the foregoing transcript is a true, accurate, and complete record.

I further certify that I am neither related to nor counsel for any party to the cause pending or interested in the events thereof.

Witness my hand, I have hereunto affixed my official seal this 16th day of June, 2025 at Charlotte, Cabarrus County, North Carolina.



Cindy A. Hayden, RMR, CRR

My Commission expires

April 7, 2027

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